#### **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 Police And Crown Prosecution Service's Response To Rape, Phase 2: Post-Charge

A national report HMICFRS Published 25 February 2022

This report makes 3 recommendations aimed at the Police, all are currently open.

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Force Task Owner	Position in March?	Direction of Travel
Amber	1	Recommendation Immediately, police and prosecutors should review and significantly improve communications with victims from the point of charge onwards.	May-22	No dates set by HMICFRS	<ul> <li>March 2022 update:         <ul> <li>Narrative provided from business leads on the support mechanisms (internally and in partnership with Vulnerable Victim Advocate (VVA)) and processes to support victims;</li> <li>Shared awareness is being captured in the force system and reports to supervisor and business leads.</li> </ul> </li> </ul>	Head of CJS and Custody	Amber - this is a new recommendation with actions to complete being assessed.	
Amber	8	Recommendation Immediately, the police and the CPS should work collaboratively to ensure that bad character is considered in all rape cases, and progressed wherever it is applicable.	May-22	No dates set by HMICFRS	March 2022 update:  • Clarifying recommendation with HMICFRS Force Liaison Officer to determine appropriate task owner.	ТВС	Amber - this is a new recommendation with actions to complete being assessed.	
Amber	9	Recommendation Immediately, forces should make sure that victims of rape are given the opportunity to make a victim personal statement (VPS) at the earliest possible time, with the option of updating this statement closer to the court trial date.	May-22	No dates set by HMICFRS	March 2022 update:  Narrative provided from business leads on the processes undertaken in compliance with the force Standard Operation Procedure (SOP) and the national Victims' Code, which also supports shared awareness where the offer of Victim Personal Statement (VPS) to, and response from, victims are: captured in the force system and rape audits; crime scrutiny groups; and the Crime Standards Board.	PPU Manager	Amber - this is a new recommendation with actions to complete being assessed.	

## 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: 6 are in progress and 1 is complete.

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Resources needed/costs involved	Force Task Owner	Position in March?	Direction of Travel
Amber	10	Recommendation Local criminal justice services (police, CPS, courts, probation, prisons) and health commissioners/providers should:  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	Nov-22	Nov-22 (HMICFRS report)	March 2022 update:  • Task owner is liaising with mental health lead and Administration of Justice (AOJ) to ascertain what is currently received & whether we can upskill internally.		Head of Learning & Development	Amber - this is a new recommendation with actions to complete being assessed.	

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Resources needed/costs involved	Force Task Owner	Position in March?	Direction of Travel
Amber	11	Recommendation 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.	Nov-22	Nov-22 (HMICFRS report)	March 2022 update:  • Task owner attends London Criminal Justice System (CJS) Board and will discuss what our partners are doing. As a force we have arrangements in place and a SOP but we need to see what is being done by partners to assess whether further improvements can be made.		Head of CJS Services	Amber - this is a new recommendation with actions to complete being assessed.	
Amber	14	Recommendation 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.	Nov-22	Nov-22 (HMICFRS report)	<ul> <li>March 2022 update:</li> <li>Currently all officers receive a generic 1 day input on vulnerability. For Investigative roles the force provides         Temporary/Detective Constable (T/DC) with more bespoke training, the Investigations academy is to deliver training to Detective Sergeant/Detective Inspector (DS/DI). Learning and Organisation Development (LOD) will conduct a review of both of these offerings.     </li> </ul>		Head of Learning & Development	Amber - this is a new recommendation with actions to complete being assessed.	

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Resources needed/costs involved	Force Task Owner	Position in March?	Direction of Travel
Amber	15	Recommendation 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	Nov-22	Nov-22 (HMICFRS report)	March 2022 update:     No dip sampling of outcome codes currently completed but after consultation this will now sit with AOJ. A process of how this will be implemented and resourced is being explored.	Head of CJS Services is requesting resources to support dip sample review.	Head of CJS Services	Amber - this is a new recommendation with actions to complete being assessed.	
Amber	16	Recommendation 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.	Nov-22	Nov-22 (HMICFRS report)	<ul> <li>Feb 2022:         <ul> <li>Force uses flags and raises Public Protection Notices (PPNs) where necessary. These are checked by the Public Protection Unit (PPU) for referrals. This data is then used by Performance Information Unit (PIU) to inform different working groups of the stats;</li> <li>The next stage is to assess gaps. Acting/DI of PPU has run a dip sample in February/March to assess this. This will be analysed and confirm what the next tasks are to complete the recommendation.</li> </ul> </li> </ul>		Acting Head of PPU	Amber - this is a new recommendation with actions to complete being assessed.	

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Resources needed/costs involved	Force Task Owner	Position in March?	Direction of Travel
Amber	17	Recommendation 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.	Nov-22	Nov-22 (HMICFRS report)	<ul> <li>March 2022 update:</li> <li>The Force has a Voluntary     Attendee (VA) SOP in place with a     risk assessment;</li> <li>This has also identified the need to     have one standard process in     place. This is a work in progress,     which has been raised with the     Crime Standards Board, for which a     business owner is being identified.</li> </ul>		Head of CJS and Custody	Amber - this is a new recommendation with actions to complete being assessed.	
WHITE (CLOSED)	18	Recommendation The police service should: Police leadership should review MG (manual of guidance) forms to include prompts or dedicated sections for suspect vulnerability to be included.	Nov-22	Nov-22 (HMICFRS report)	After consulting with HMICFRS it has been clarified that this recommendation has been assigned to the NPCC to look into as individual forces cannot change the Manual of Guidance (MG) forms. There is nothing further the force can do.		Head of CJS Services	Previously AMBER for February 2022 update  March 2022 Now WHITE (CLOSED)	

### 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 and 1 is green pending HMICFRS sign-off.

Status	No.	Recommendation &/or	Due	Original Due	Comments	Force Task	Position in	Direction
		Area for Improvement	Date	Date		Owner	March?	of Travel
Green - pending HMICFRS sign off	4	Recommendation 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	Mar-22	Mar-22 (HMICFRS report)	<ul> <li>March 2022 Update:         <ul> <li>Our response is in line with NPCC national framework, the Delivery plan is bespoke to the city but based upon the NPCC three pillars. Our performance in this area will be tracked through individual action plans for strand leads and will be Red Amber Green (RAG) rated. The performance will be submitted to the NPCC in two initial stages. March 22, all forces to submit a data return outlined in the framework. June 22, Key pillar 1 and 2 deadline returns. Key areas have been identified where we need to invest in ensuring that we maintain the high standards we already have in our response to Violence Against Women and Girls (VAWG).</li> </ul> </li> </ul>	Det. Ch. Supt. Head of Professionalism and Trust	Green - with the VAWG action plan in place, training, an internal review of cases against officers/staff, along with a range of other priorities, the force assesses this recommendation as Green. It is an ongoing recommendation but all the processes and checks are in place for moving forward.	

# 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, 1 is green pending HMICFRS sign-off and 3 are in progress.

Status	No.	Recommendation &/or	Due	Original Due	Comments	Force Task	Position in	Direction
		Area for Improvement	Date	Date		Owner	March?	of Travel
Amber	2	Recommendation Chief constables should ensure data is gathered on the use of voluntary attendance to enable the identification of patterns of its use, particularly in relation to the types of cases, so that voluntary attendance is only used in those cases where it would be an appropriate case management tactic.	Nov-22	March-22 (HMICFRS report)	March 2022 update The original due date was set by the Force not by HMICFRS. Since the original due date was issued, this action has now been linked to recommendation 17 from "A joint thematic inspection of the criminal justice journey for individuals with mental health needs and disorders." And it has been assessed that the Force should have given itself a longer timeline at the outset. The Force will have this in place by November 2022 which ties into the timeline with the above mentioned Recc 17 from the other inspection.  The Force has a Voluntary Attendee (VA) SOP in place with a risk assessment;  This has also identified the need to have one standard process in place. This is a work in progress with the business lead and	Superintendent Head of CJS Service	Amber- this has gone from Green to Amber due to a clear VA process not being in place. The Commander for Operations has asked the Head of CJS services to look into Voluntary Attendees.	

Status No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Force Task Owner	Position in March?	Direction of Travel
Green - 7 pending HMICFRS sign off	Recommendation 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.	Mar-22	No dates set by HMICFRS	<ul> <li>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.</li> <li>Court meeting was unable to offer an immediate solution. There are still delays caused by Covid and this is impacting all areas of the court system.</li> <li>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 PPU. This would enable early notification of any NMO granted.</li> <li>Qualifiers have recently been reviewed by the Niche region, meaning additional qualifiers cannot not be added at this time.</li> <li>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 Business Objects (BOBs).</li> </ul>	Head of PPU	Green - this is going to be submitted to HMICFRS as the force assesses it is doing all it can to meet this recommendation as per the evidence column.	

Status	No.	Recommendation &/or	Due	Original Due	Comments	Force Task	Position in	Direction
		Area for Improvement	Date	Date		Owner	March?	of Travel
Green - pending HMICFRS sign off	11	Recommendation Chief constables should, until Domestic Abuse Protection Notices (DAPOs) replace Domestic Violence Protection Notices (DVPNs) and Domestic Violence Protection Orders (DVPOs) in their force: A. Review, and if necessary refresh their policy on DVPNs and DVPOs, and in line with the overarching recommendation: 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; Monitor their use to ensure they are being used effectively; and  B. Ensure experience and lessons learned on using DVPN/DVPOs informs the	Mar-22	Mar-22 (HMICFRS report)	<ul> <li>The following are complete:</li> <li>Use of DVPNs monitored as part of DA dip sampling in Crime Scrutiny Group to ensure it has been considered.</li> <li>Forms part of PPU supervisor review of all DA cases prior to No Further Action (NFA).</li> <li>Clear guidance included in SOP.</li> <li>Monthly meeting with Crown Prosecution Service (CPS)/Metropolitan Police Service (MPS) and courts discuss issues arising from DVPNs, best practice, changes to process and lessons learned.</li> <li>March 2022 Update:</li> <li>Training inputs are still outstanding, however, these now form part of the VAWG action plan. Deadline for training is May 22 although PPU DS is trying to schedule these earlier where time allows.</li> <li>SOP has now been signed off and published.</li> </ul>	Head of PPU	Green - Pending HMICFRS sign off. The action owner assesses the Force meets the requirements of implementing this recommendation including having training scheduled for next month.	

Status	No.	Recommendation &/or Area	Due	Original Due	Comments	Force Task	Position in	Direction
		for Improvement	Date	Date		Owner	March?	of Travel
Amber	13	Recommendation Chief constables should assure themselves that:  13A. their officers are fully supported in carrying out their duties to protect all vulnerable domestic abuse victims by: 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;  13B. governance is in place to monitor the use of all protection orders and to evaluate their	Aug-22	No dates set by HMICFRS	<ul> <li>Update on 13A - Bullet 1, 2 and 3</li> <li>PPU has been trained as part of specialist training in relation to protective orders available. (All relevant VAWG cases would oversee/investigated by PPU). Supervisors include as part of supervisor review, appropriateness of relevant/available orders.</li> <li>Making progress with Domestic Abuse Matters training which will be delivered by this summer (May - August). L&amp;OD working with their trainers as part of the 3 month mobilisation plan, meeting regularly to localise the product. Media and Force Engagement will commence shortly. Recommendation will be captured by the training outcomes and will be delivered to all offers and appropriate staff face to face on 1 day inputs.</li> <li>Referral pathways are clearly documented in SOPs and intranet and Vulnerable Victim Advocate is well publicised and has recently briefed all frontline staff outlining available support—this stretches across the partnership.</li> <li>Update on 13B</li> </ul>	Head of PPU and Head of Learning & Development	Amber - this is ongoing and until all training has been completed the Force is retaining it as amber. Review date for August set once training delivered. It is felt that 13.b has now been met.	

effectiveness, including by seeking the views of victims.	Dip sampling and Domestic Abuse surveys continue and results reports to appropriate governance meetings		

#### 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

Status	No.	Recommendation &/or Area	Due	Original Due	Comments	Force Task	Position in	Direction
		for Improvement	Date	Date		Owner	March?	of Travel
Amber	2	Recommendation 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.	Sep-22	Mar-22 (HMICFRS report)	<ul> <li>March 2022 Update</li> <li>An effective tasking of crimes from NFIB going to law enforcement is in place</li> <li>Tasking is supported through Lead Force Operations Room (LFOR)</li> <li>Escalation between policing and NECC/NCA is in place via bilateral tasking arrangements</li> <li>FOIM (Fraud Operation Intelligence Meeting) set up for monthly meeting to track cases requiring escalation and adoption</li> <li>Intelligence side of meetings successful, operationally no cases have been accepted</li> </ul>	Commander National Lead Force Operations	Amber - the HMICFRS Force liaison has agreed progress is being made on this recommendation but assesses there is still work required. He has offered advice to the business leads on this and they will continue to work forward. This recent	

	or escalated from policing to NCA/NECC or partners.  Progress still needs to be made in tasking cases that are not accepted by policing.  CoLP looking at using Agency Partnership Management Information System (APMIS) to task Priority 1/Priority 2 cases.  Working group set up to discuss and plan resolution and recommendations.  Improvements are still required in decision making at the FOIM;  Advice has been sought from the HMICFRS Force Liaison Officer on the next steps for this recommendation and whether enough has been done to close at this stage:  HMICFRS Force Liaison agrees the process is taking shape but assesses more work is required. The monitoring portal will be updated with the current briefing on this. He has offered suggestions extending the deadline by six (6) months to meet the challenges the team are facing.  Commander NLF ops and NECC Dep Director have met to discuss this and NECC has escalated the CoLP recommendation paper to the Threat lead for review.	update document will be uploaded to the monitoring portal to show progress. An extension of deadline will be needed to move by 6 months to September to meet the challenges the team are facing and the requirement of the HMICFRS Liaison Officer.
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#### 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, 2 are green pending HMICFRS sign-off, and 1 is in progress.

Status	No.	Recommendation &/or	Due	Original Due	Comments	Force Task	Position in	Direction
Amber	3	Area for Improvement  Recommendation  Police forces should collect data to record the different stages when, and reasons why, a victim may withdraw	Due Date Jun-22	Dec-21 (HMICFRS report)	<ul> <li>Reasons why rape victims fail to support is recorded on Niche OEL and via outcome codes.</li> <li>Procedure for recording victims wishes on statement/other police records or Body Worn Video (BWV) where able is within the force SOP.</li> </ul>	Owner  Head of CJS Services and FCR	March?  Amber – templates are ready to go to the Niche regional team for sign off	of Travel
		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.			<ul> <li>Audits of outcome 16 [Domestic Abuse] have taken place and the CPS has agreed to look at outcome 15 [Domestic Abuse] with PPU.</li> <li>March Update:         <ul> <li>Outcome 14,15,16 templates are being reviewed against HMICFRS criteria. The templates will make it easier to record the reasons for withdrawal and ensure appropriate auditable records are obtained. PPU will mandate their use for all rape cases. The templates will allow for auditing and also PIU to develop bespoke reports. DCI CJS is working with DI Niche team to check if any existing templates within Niche can do what we need them to do. If not then request for updated templates will go to Niche regional team in May for sign off.</li> </ul> </li> </ul>		in May.	

Status	No.	Recommendation &/or Area	Due	Original Due	Comments	Force Task	Position in	Direction
		for Improvement	Date	Date		Owner	March?	of Travel
Green - pending HMICFRS sign off	6	Recommendation 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.	Mar-22	Dec-21 (HMICFRS report)	<ul> <li>March Update:         <ul> <li>As part of Operation Bluestone/Soteria<sup>1</sup> this is being looked at nationally under the transformation of rape investigations. Whilst this national work is continuing, CoLP has a clear Standard Operating Procedure (SOP) as to expectations for updating victims in relation to rape. CPS RASSO (Rape and Serious Sexual Offences) lead has responded to this with their usual practice when it comes to NFA in Rape cases. i.e They will work with the Officer In the Case/Sexual Offences Investigation Trained (OIC/SOIT) officers at CoLP to ensure NFA is conveyed to victim <i>in the most appropriate way</i>. This is documented in the Force SOP. Head of CJS and Custody assess that this can now be closed as Green.</li> </ul> </li> </ul>	DCI Head of CJS and Custody	Green following communication with CJS about how to improve communication to victims where there is NFA and an updated SOP that documents how the force should communicate the action lead assesses this recommendation is met and is Green.	

<sup>&</sup>lt;sup>1</sup> Operation Soteria Bluestone | College of Policing

Status	No.	Recommendation &/or	Due	Original Due	Comments	Force Task	Position in	Direction
		Area for Improvement	Date	Date		Owner	March?	of Travel
Green - pending HMICFRS sign off	7	Recommendation Police forces should ensure investigators understand that victims are entitled to have police decisions not to charge reviewed under the Victims' Right to Review (VRR) scheme and should periodically review levels of take-up.	Apr-22	Dec-21 (HMICFRS report)	<ul> <li>This is communicated as part of final contact with victim.</li> <li>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 (VRR) at point of NFA and forms part of supervisor (DS and DI level) final supervisor review.</li> <li>March update:         <ul> <li>New VRR template is now on Niche and details have been circulated to PPU. VRR checks will be included in the Rape/Sexual Offence Audit reports provided to the Crime Scrutiny Group by the FCIR.</li> </ul> </li> </ul>	Head of CJS and Custody	Green – SOP updated, Niche templates updated to include area for VRR recording. Audits will be done by crime registrars and fed back to the crime scrutiny group for compliance.	

# 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 are complete and 1 in progress.

Status	No.	Recommendation &/or Area for	Due	Original Due Date	Comments	Force Task	Position in March?	Direction of Travel
Amber	3	Improvement  Recommendation To chief constables 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	Oct-22	Oct-21 (HMICFRS report)	<ul> <li>Currently:</li> <li>The Force has a SOP for ownership of reactive Modern Slavery, Human Trafficking (MSHT) investigations;</li> <li>The Force works with its partners and agencies to participate in operations to disrupt and take out county line activities;</li> <li>Force is part of the National Section 22 on Modern Slavery and Immigration Crime and currently due to re-sign a refreshed agreement which offers advice and expert knowledge, and the business lead would have access to seek advice and guidance for cases/situations;</li> <li>MSHT benchmark exercise undertaken to assess good practices and gaps and is fed back at a national level through the Serious Organised Crime (SOC) board, with results captured in an action plan centred on thematic themes. This will also be applied to OIC owing to links with MSHT;</li> </ul>	T/ DI ART manager	Amber - A new lead for MSHT has been appointed and a new deadline is needed to make sure all improvements are implemented before closing this recommendation. The new deadline has been proposed as October 2022	or Iravel

	<ul> <li>Resourcing issue has been addressed with two (2) deputy leads for MSHT to streamline case acceptance criteria and work to proceed with the action plan;</li> <li>New MSHT lead recruited to replace current lead;</li> <li>Update on recommendations sent to NPCC for their consideration.</li> </ul>	
	Going forward:  • MSHT to recruit volunteers including sector policing officers owing to their links and network with vulnerable groups.	

## **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 is green pending HMICFRS sign-off.

Status N	No.	Recommendation &/or	Due	Original	Comments	Force Task	Position in	Direction
Green - pending HMICFRS sign off	1	Recommendation 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 deescalation.	Jul-22	Jul-22 (HMICFRS report)	<ul> <li>Mentivity training commenced October 2021 for front line officers.</li> <li>Virtual Continuous Professional Development(CPD) sessions focusing on stop and search were delivered to 85 officers and staff this year and a written bulletin sent force wide to compound this learning.</li> <li>A Focus on CPD virtual training session providing an input on communication was well received and a written bulletin was published in December 2021</li> <li>'Focus on' communication bulletin published Jan 2022</li> <li>Stop search training for frontline officers has been built into the training timetable and is scheduled for June and July 2022</li> <li>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.</li> <li>An additional video is being developed in collaboration with the British Transport Police (BTP) with a planned release within 4 weeks</li> </ul>	Head of Learning & Development	March?  Green - it is assessed that the training plan in place meets the criteria for this recommendation.	of Travel

### **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, which are all complete pending outcome of NPCC challenge.

Status	No.	Recommendation &/or Area	Due Date	Original Due	Comments	Force Task	Position in	Direction
White	1	Recommendation  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).  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	WHITE pending the outcome of the NPCC Lead challenge to HMICFRS	February 2021 for initial review	<ul> <li>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.</li> <li>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.</li> <li>The current force SOP already includes relevant guidance in relation to victims with no leave to remain.</li> <li>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. All cases where consent from victim is obtained are referred to specialist victim advocate who can assist with immigration</li> </ul>	DCI Crime and DI PPU	WHITE – Force response to the recommendations is on the gov.uk website and also CoLP website. This is still pending and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	of Travel

for the police service to clarify this aspect of practice. Notes to recommendation 1 This recommendation to stop information sharing only applies to victims of domestic abuse The College of Policing guidance will also clarify the difference between insecure an 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 victin support organisation or anothe individual/organisation that car act as an intermediary and advocate on the victim's behalf in communications with Immigration Enforcement – as	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.  • March Update: still waiting on response from NPCC as per their challenge to HMICFRS. The forces' response so far has been published on the CoLP website
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Status	No.	Recommendation &/or Area for	Due Date	Original Due	Comments	Force Task	Position in	Direction
		Improvement		Date		Owner	March?	of Travel
White	4	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: - 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	WHITE pending the outcome of the NPCC Lead challenge to HMICFRS	February 2021 for initial review [completed]  July 2021 (self- defining policing date) for the review of relevant forces SOPs although compliance with this recommendation is dependent upon delivery of recommendation 3 by the Home Office and NPCC	<ul> <li>Following initial review of the report recommendation it has been determined that completion of this action is, in part dependent upon the Home Office and NPCC to develop a safeguarding protocol [recommendation 3].</li> <li>Currently there is no timeline for deliver by the Home Office and NPCC and the force maintains a watching brief.</li> <li>The NPCC Lead challenge [above] will also impact delivery].</li> <li>March Update:</li> <li>Still waiting on response from NPCC as per their challenge to HMICFRS. The forces' response so far has been published on the CoLP website</li> </ul>	DCI Crime and DI PPU	WHITE – Force response to the recommendations is on the gov.uk website and also CoLP website. This is still pending and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	

information will be shared by			
police with immigration			
enforcement;			
- provide clarity about the purpose			
of sharing information at different			
points of the pathway; and			
- explicitly recognise the			
importance of telling victims,			
witnesses and supporting agencies			
whether information will be			
shared with Immigration			
Enforcement, and if so, when and			
in what circumstances.			
- promote understanding among			
police officers and staff to			
differentiate between responses			
to victims of modern			
slavery/human trafficking and			
victims of domestic abuse;			
- promote awareness within their			
forces of any existing pathways to			
specialist organisations for			
supporting victims with insecure			
immigration status;			
- ensure the policy and practice			
framework is adopted by all			
officers and staff who come into			
contact with victims of crime who			
have insecure immigration status;			
and			
- promote police engagement in			
regular outreach community work,			
as highlighted as good practice in			
this report			

Status	No.	Recommendation &/or Area	Due Date	Original Due	Comments	Force Task	Position in	Direction
		for Improvement		Date		Owner	March?	of Travel
White	5		WHITE pending the outcome of the NPCC Lead challenge to HMICFRS	February 2021 for initial review [completed]  July 2021 (self- defining policing date) for the review of relevant forces SOPs although compliance with this recommendation is dependent upon delivery of recommendation 3 by the Home Office and NPCC	<ul> <li>Following initial review of the report recommendation it has been determined that completion of this action is, in part dependent upon the Home Office and NPCC to develop a safeguarding protocol [recommendation 3].</li> <li>Currently there is no timeline for deliver by the Home Office and NPCC and the force maintains a watching brief.</li> <li>The NPCC Lead challenge [above] will also impact delivery].</li> <li>March Update:</li> <li>Still waiting on response from NPCC as per their challenge to HMICFRS. The forces' response so far has been published on the CoLP website</li> </ul>	DCI Crime and DI PPU	WHITE – Force response to the recommendations is on the gov.uk website and also CoLP website. This is still pending and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	

## **Cyber: Keep The Light On**

A national report by HMICFRS Published October 2019

This report makes 5 recommendations which are all complete.

Status White (CLOSED)	No. 1	Recommendation &/or Area for Improvement  Recommendation 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:  • 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	Due Date WHITE (CLOSED)	Original Due Date  Nov-20 (HMICFRS report)  Now September 2021 (self- defining policing date) for update from the joint working group	<ul> <li>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.</li> <li>The Home Office, CoLP and NPCC have agreed to establish a working group to consider options to implement the recommendation, this has now initially met but a large amount of work is yet to be done.</li> <li>This action is held at WHITE since the force is reliant on progress beyond its control but is attempting to influence.</li> <li>This recommendation is not on the HMICFRS monitoring portal as it involves a number of agencies and institutions and on the part of CoLP the NLF, therefore after consultation with our HMICFRS force liaison we will close</li> </ul>	Force Task Owner  Det Ch. Supt. Programme Lead NPCC Cyber Crime Programme	Position in March?  WHITE - CLOSED - this is not on the HMICFRS portal and the Force is not being monitored on this as it involves a number of agencies. This will continue on under the watch of the NLF.	Direction of Travel
		<ul><li> the remit of any such network;</li><li> how the network engages with</li></ul>			monitoring portal as it involves a number of agencies and institutions and on the part of CoLP the NLF, therefore after consultation			

### 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 are complete and 1 in progress.

Status	No.	Recommendation &/or Area	Due	Original Due	Comments	Force Task	Position in	Direction
		for Improvement	Date	Date		Owner	March?	of Travel
Amber	10	Cause of concern Some victims may not be receiving support services, and some support services don't work as well as they could. This is because the police don't always refer victims when they should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.  Recommendation 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	Jun-22	Jan-20 (HMICFRS report)	<ul> <li>The City of London Police has a number of processes and services in place to assist vulnerable victims.</li> <li>The force has two Vulnerable Victim Advocates.</li> <li>Victim Satisfaction Surveys are used to understand the needs of the public</li> <li>A wider adoption of other communication channels for surveys, has led to improved engagement with harder to reach groups.</li> <li>The Victim Code of Conduct is followed in all victim contact, including during crime assessment.</li> <li>When a case is assigned to an officer, contact is made with the victim to discuss their needs, establishing where support may be needed or to give support advice for relevant agencies.</li> <li>The force also has the Victim Care Unit (VCU) as part of the National Lead Force response to Fraud.</li> <li>Cyber Griffin leads in Police victim care in the area of cyber criminality. It offers services designed to support individuals and organisations who have been victims of Cyber Crime.</li> <li>The victim right of review - if there is a decision not to prosecute the suspect, the victim has a right to be told within 5 working days.</li> <li>The VCU successfully bid and received funding for 100 hundred call blocker units. They are highly</li> </ul>	DCI Head of Major Crime	AMBER - This is progressing and awaits confirmation from business lead as to whether they assess that the recommendation has been met.	

	effective at blocking nuisance/ scam calls and are	
	proven to increase the wellbeing of individuals	
	when installed.	
	AC Betts has commissioned an internal report to	
	the Force Audit and Risk meeting to consider what	
	further needs to be done to close this	
	recommendation.	

## PEEL 2018/2019

A force report by HMICFRS Published May 2019

This report makes 11 areas for improvement for the force: 10 are complete and 1 is green pending HMICFRS sign-off.

Status	No.	Recommendation &/or Area for Improvement	Due Date	Original Due Date	Comments	Force Task Owner	Position in March?	Direction of Travel
Green - pending HMICFRS sign off	2	Area for Improvement The force should implement a process to get feedback from vulnerable victims.	Apr-22	Dec-19 (HMICFRS report)	<ul> <li>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.</li> <li>March Update:         <ul> <li>The Domestic Abuse (DA) surveys have been completed and the results are currently being analysed.</li> <li>PPU has secured the funding for the VVA for next year and is looking at options to secure this funding for future years.</li> </ul> </li> <li>As of 17/03/22,         <ul> <li>A scheme for victim surveys has started. A list of 10 occurrences have been dip sampled across different crime types (inc. stalking, harassment, low level sexual offences &amp; hate crimes).</li> <li>VVAs will contact the victims 3 times over a number of weeks to ask them to complete the over the phone survey. This allows for safeguarding and victim care that an online survey would not offer. The VVAs have been asked to log the time they spend on these surveys so an assessment of impact can be done.</li> </ul> </li> </ul>	DCI Head of Major Crime + DS PPU	Green - a process is now in place and the scheme for VVA's to contact victims has now started. This is Green pending HMICFRS sign off.	

### **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: 7 are complete and 1 is green pending HMICFRS sign-off.

Status	No.	Recommendation &/or	Due Date	Original	Comments	Force Task	Position in	Direction
		Area for Improvement		Due Date		Owner	March?	of Travel
Green - pending HMICFRS sign off	8	Recommendation 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.  • 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	March 22 - aligned to PEEL 2018/19 (Rec 2) as above	Dec-19 (HMICFRS report)	<ul> <li>Task [4]</li> <li>This action is linked to recommendation 2 "PEEL 2018/2019" – Both action deadlines now aligned.</li> <li>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.</li> <li>March Update:</li> <li>The Domestic Abuse (DA) surveys have been completed and the results are currently being analysed.</li> <li>PPU has secured the funding for the VVA for next year and is looking at options to secure this funding for future years.</li> <li>As of 17/03/22</li> <li>A scheme for victim surveys has started. A list of 10 occurrences have been dip sampled across different crime types (inc. stalking, harassment, low level sexual offences &amp; hate crimes).</li> <li>VVAs will contact the victims 3 times over a number of weeks to ask them to complete the over the phone survey. This allows for</li> </ul>	Head of PPU and Performance Analysis Manager	Green - a process is now in place and the scheme for VVA's to contact victims has now started. This is Green pending HMICFRS sign off	The state of the s

force governance	safeguarding and victim care that an online	
processes, including	survey would not offer. The VVAs have been	
external scrutiny.	asked to log the time they spend on these	
	surveys so an assessment of impact can be	
	completed as it is time consuming.	