

**POLICE AUTHORITY**  
**REVIEW OF RESPONSIBILITIES**

September 2022

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## CONTEXT

The City of London Police Act 1839 established the Court of Common Council as the Police Authority for the City of London. The Court delegates this duty (except for the appointment of the Police Commissioner) to the Police Authority Board and its Committees (Strategic Planning and Performance; Resource, Risk and Estates; Professional Standards and Integrity; Economic and Cyber Crime). The function is supported by a team of officers (Police Authority Team).

There is no single statutory instrument that sets out the powers and duties of the Police Authority or Police & Crime Commissioners (PCCs). Police legislation has evolved over many years and local government legislation also plays a part in regulating duties.

The application of legislation and orders relating to PCCs does not always apply to the City of London and is not legally binding. However, the City of London has committed to abiding by the principles of this legislation and for the purposes of this review it is assumed that this should apply across the full range of responsibilities, with the exception of taking responsibility for emergency service collaboration and the Fire & Rescue Service.

In June 2022, Internal Audit undertook a review of the Police Authority governance against the Policing Protocol 2011 to evaluate the extent to which the Police Authority meets the relevant governance requirements. A summary of these recommendations and associated comments are attached at Appendix 1. It recommended the Police Authority should implement a programme of self-assessment exercises to determine the extent to which its governance and oversight arrangements meet the requirements of the Policing Protocol Order 2011. The Police Authority Team decided to extend this recommendation by undertaking a review of its compliance against a wider range of instruments and took the opportunity to consider emerging policy and legislative reform.

When undertaking this review, the following legislation and orders were considered:

Specific legislation:

- City of London Police Act 1839
- Police Reform and Social Responsibility Act 2011
- Police Act 1996 as amended
- Policing and Crime Act 2017
- Anti-Social Behaviour, Crime & Policing Act 2014
- Crime & Disorder Act 1998
- Police, Crime, Sentencing and Courts Act 2022

Codes and orders:

- Policing Protocol Order 2011
- Revised Financial Management Code of Practice for the Police Service of England & Wales
- Specified Information Order

General legislative requirements:

- Equality Act 2010
- Freedom of Information Act 2000
- Data Protection Act 2018
- Equality and Human Rights Commission Public Sector Equality Duty

Bills and emerging policy:

- Victims Bill
- Proposed legislative reforms linked to the PCC Review

This report has also been informed by the following documents and guidance, as well as the knowledge and experience of the Police Authority Team:

- Association of Police & Crime Commissioners Guide for PCCs
- Association of Police & Crime Commissioners Equality Framework
- National Police Chiefs' Council / College of Policing Race Action Plan
- Association of Police & Crime Chief Executives Police and Crime Plans Guidance
- Association of Police & Crime Chief Executives Statement on the Role of the Chief Executive and Monitoring Officer
- Chartered Institute of Public Finance and Accountancy Guidance on the Role of Chief Finance Officers in Policing
- Legally Qualified Chairs Handbook
- Independent Office of Police Conduct Statutory Guidance on the Police Complaints System
- Independent Custody Visiting Association Quality Assurance Framework
- City of London Internal Audit Management Report May 2022
- City of London Policing Plan

## EXECUTIVE SUMMARY

- The Police Authority has been fulfilling most of its core functions but there is room for improvement. Management of complaint reviews and responses to Her Majesty's Inspectorate of Constabulary Fire & Rescue Services (HMICFRS) inspections can be improved to avoid a potentially negative impact on public confidence in policing, and stakeholder confidence in the Police Authority. Processes are being put in place to deliver these improvements, and there will be greater accountability to the Director and Police Authority Board on these areas of performance.
- The Police Authority must have a greater focus on crime prevention given its role in ensuring efficiency and effectiveness. While most force areas span multiple local authorities, integration of local authority community safety and police authority activities should be much less complex in the City. The Police Authority should take a more active role in influencing and supporting crime prevention. This brings it in line with PCC functions and government policy ambitions to strengthen their role and influence in crime prevention. As a minimum, this should include some oversight of the Safer City Partnership (the City's community safety partnership) by the Police Authority Board, advocating for sustainable funding for the Community Safety team, and closer working at an officer level through some shared functions such as analysis and community engagement. It could also consider structural reform to bring Police Authority and Community Safety under combined Corporation leadership and/or governance.
- The role of PCCs in fostering greater public confidence in the police is being strengthened and developed. While Members represent the views of their communities, the Police Authority has been primarily reliant on the police for its community engagement. The implementation of the new Police Authority team operating model provides opportunity for it to take a more active role in engagement. This includes understanding where its engagement is, or is not representative. This should be aligned to a wider Corporation community engagement strategy which is under development. Ideally this would be supported by centralised access to internal and external data sources and a professional lead for analytical capabilities across the Corporation.
- The above includes engaging with and understanding victim views. Putting the victims at the heart is a Policing Plan priority. The Police Authority should work with City of London Police (COLP) to develop a joint victim strategy. This could, for example, include Police Authority engagement with victims through a victim champion, and improved oversight of how effectively support services for City victims commissioned by COLP, the Community Safety team and Mayor's Office of Policing & Crime (MOPAC), are meeting people's needs.
- The Police Authority should take more of an active role in setting the forward plan and agenda for its governance boards and committees, in collaboration with COLP. For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need. The Police Authority should work with COLP to review its framework for scrutiny, including standing agenda items, to ensure oversight of all key areas and alignment with good practice across other police oversight bodies.
- Once COLP internal governance has been finalised, there should be consideration of the role of Police Authority officers as observers on key strategic boards. The same should be done for the London regional governance led by MOPAC where it impacts the City (eg the London Criminal Justice Board). A learning and development programme is being developed for both Members and the Police Authority Team to assist them in their roles.

- The Police Authority has a financial assurance framework established in January 2021. It covers medium term financial planning, revenue and capital budget setting, budget monitoring / out turn reporting, value for money assessment and financial control and management capabilities. The primary focus of the Police Authority has been on core grant. The quality of information provided to the Police Authority Board and COLP's ability to align funding and resources has been improving. There is scope for greater scrutiny of and strategic direction from the Police Authority on other funding strategies and opportunities, and allocation of Asset Recovery Incentivisation Scheme (ARIS) funding.
- The key responsibilities contained within this document form a base for regular review of how the Police Authority is complying with expectations and legislation. As legislation affecting the roles and responsibilities of policing and PCCs is continuing to evolve, the Police Authority should implement a structured approach to horizon scanning to enable it to (a) establish policy positions and influence the development of legislation and (b) ensure it is effectively planning for implementation of new requirements.

## MAIN RESPONSIBILITIES:

<p>1. [Crime &amp;] Policing Plan</p> <ul style="list-style-type: none"> <li>• Issue a [Crime &amp;] Policing Plan incorporating the views of its communities and having due regard to the Strategic Policing Requirement</li> <li>• Scrutinise, support and challenge the overall performance of the force including against priorities agreed within the Plan</li> </ul>	<p>Assessment: Compliant</p>
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### Overview

City of London has policing priorities which inform the activities of COLP. The Policing Plan takes account of the Strategic Policing Requirement. Community views are gathered through police-led engagement and contributions from Members, as representatives of their communities. There is some consultation with other Corporation departments, led by the police. The Police Authority Team relies on the force's engagement to obtain community views and Member representation.

Processes are in place to issue a plan every 3 years along with an annual refresh. Consultation commences in the Autumn, a draft plan is submitted to Police Authority Board in December for comment with the final version submitted for sign off in March. Performance against the priorities agreed in the plan are monitored through SPPC.

### Recommendations

<p>Improve insight into community views by using and gathering information from wider Corporation engagement channels and ensure views are representative of the range of communities (see section on community engagement below)</p>	<p>To be implemented for the Policing Plan refresh commencing in 2023</p>
<p>Review and implement processes to support Ward Members to gather and contribute the views of their communities to policing priorities</p>	<p>To be incorporated into current Policing Plan refresh (Autumn 2022)</p>
<p>Implement processes to lead Corporation consultation on policing priorities to ensure strategic alignment across departments</p>	<p>To be incorporated into current Policing Plan refresh (Autumn 2022)</p>
<p>Create greater strategic alignment between the activities of the Police Authority Team and COLP by incorporating how the PA will support delivery of these priorities in its business plan</p>	<p>To be incorporated into current business planning process (Winter 2022/23)</p>

### Emerging policy

- A new Strategic Policing Requirement is expected to be published in 2022
- The Home Office intends to legislate to introduce a new reciprocal duty for PCCs and Regional Probation Directors to consult one another when developing priorities for their Policing and Crime Plans and Regional Reducing Reoffending Plans respectively.

2. Appoint, suspend or remove the Commissioner

Assessment:  
Compliant

Overview

The power to appoint and remove the Commissioner is contained within the City of London Police Act 1839 and the Police Authority / Court of Common Council has appointed all City of London Police commissioners to date. The removal of the City Police Commissioner is governed by s.3 which states “and Her Majesty, or the Court of Mayor and Aldermen, may remove the said Commissioner, if She or they shall see Occasion so to do, for Misconduct or other reasonable Cause”. However, it does not detail the process that should be followed.

The Commissioner has an annual Performance Appraisal with the Town Clerk, who seeks feedback from the Chair of the Police Authority Board and other stakeholders.

Recommendations and emerging policy

The recent internal audit recommended the standing orders of the Court of Common Council were updated to reflect the Court's legal power and duty to remove Commissioner where required.

This was based on their review of the Policing Protocol 2011 which states that a “PCC has the legal power and duty to:.... (f) remove the Chief Constable subject to following the process set out in Part 2 of Schedule 8 to the 2011 Act and regulations made under section 50 of the Police Act 1996(3);”. However, Schedule 8 does not apply to the City of London.

The PCC Review recognised there is a lack of transparency and rigour to current processes for suspending or removing chief constables. In 2017 the chief constable of South Yorkshire successfully challenged his removal by the PCC in the High Court. The Court determined the PCC decisions were irrational and therefore unlawful. More recently, the government commissioned a review of how the Metropolitan Police Commissioner came to leave office.

The PCC Review includes a commitment for the Home Office to legislate to amend Section 38 of the Police Reform and Social Responsibility Act 2011, to make the Chief Constable dismissal process more rigorous and transparent, by requiring a PCC to give the Chief Constable written notice (including grounds), as the first stage of the dismissal process; allowing for the Chief to provide Her Majesty’s Inspector of Constabulary Fire & Rescue Service with a response to those grounds; and introducing some form of time limit or review interval on a Chief Constable’s suspension from office. The Home Office will also work with the College of Policing, National Police Chiefs’ Council and Association of Police & Crime Commissioners to develop a framework for the use of independent mediation in appropriate circumstances.

To address the internal audit recommendation once nationally-led work to legislate and develop processes for removal of chief constables has been completed.

Not to commence until national policy has been developed

<p>3. Complaints and reviews</p> <ul style="list-style-type: none"> <li>Responsible for complaints against the Commissioner (to be investigated by IOPC) and appeals/reviews of less serious misconduct cases (IOPC handles serious cases).</li> <li>Complainants must be updated on progress every 28 days.</li> </ul>	<p>Assessment: Partially compliant</p>
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### Overview

The Police Authority Team has a dedicated officer for managing complaints and reviews and making recommendations to a Member led panel on the outcome of these reviews. Effective management of complaint reviews and complaints against the Commissioner is an important part of the Police Authority's contribution to public confidence.

There has been a lack of oversight and accountability for the delivery of this function. Timeliness of dealing with complaints has not always been good and complainants have not always received their statutory 28 day updates on progress.

The Police Authority receives approximately 20-25 review requests a month of which around a quarter meet the requirements for review and fall within the remit of the City of London.

In May 2022 there were 6 reviews outstanding with 4 more than a year old. As at end of July 2022, 4 of these outstanding reviews have been finalised.

The average number of days to process complaints/reviews varies across force areas. Resolution can be impacted by response times from other parties. However, the Police Authority Team has set an ambition to process all reviews within 28 days and will diarise monthly panel review meetings to ensure timeliness of decision making by Members. Where this is not achievable the Police Authority commits to providing updates on progress to complainants every 28 days.

### Recommendations

Implement a system for recording and monitoring status of complaints and reviews to improve management of processing and updates	Complete
Develop a monthly dashboard report to the Director of the Police Authority to improve oversight of performance	Complete
Submit an annual report to Police Authority Board in February each year covering both COLP and PA performance on complaints	Incorporated into PAB standing agenda items
Publish complaints performance data on the Police Authority website (Statutory Information Amended Order 2021)	February 2023
Update the Police Authority website to improve signposting for complainants and implement an online form for requests to ensure all relevant information is captured, reducing delays and demand caused by the need to make secondary contact.	Autumn 2022



#### 4. Operate an Independent Custody Visitor scheme

Assessment:  
Compliant

#### Overview

The Police Authority Team has an officer with responsibility for administering and managing the Independent Custody Visiting (ICV) scheme, and a Member with responsibility for scrutiny. The Police Authority is a member of the Independent Custody Visiting Association (ICVA) which provides guidance and good practice for scheme managers.

ICV panel meetings are held quarterly to review custody usage figures and discuss visits undertaken across custody in the previous quarters. Meetings provide ICVs with the opportunity to highlight any issues of concern and good practice across use of force, strip search and the provision of mental health support.

An annual report is submitted to the Police Authority Board on the ICV scheme which includes response to HMICFRS recommendations, work undertaken by the panel and priorities for the following year.

The ICVA operates a Quality Assurance Framework (QAF) for schemes which is assessed bi-annually. There are four categories – compliant, silver, gold and platinum. The Police Authority was graded silver in the last assessment (2018). This is considered a good standard.

Following a pause in the QAF due to Covid, the next assessment period will run from 1 April 2022 to 30 September 2023. The Police Authority aim is to maintain its Silver status in the next assessment.

#### Recommendations

While the Police Authority is not currently aiming for the QAF Gold status, to review the ICVA QAF to understand which Gold standard elements it may wish to implement (taking into account level of resource versus additional benefit to detainee welfare)	November 2022
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#### Emerging policy

National Police Chiefs' Council and the Association of Police & Crime Commissioners are developing an Independent Scrutiny Panel concept to address disproportionality in police custody (piloted in Thames Valley). The aim is to complement existing police custody scrutiny (ie ICVs and HMICFRS) and for it to fall under the governance of PCCs.

<p>5. Police misconduct panels and police appeals tribunals</p> <ul style="list-style-type: none"> <li>Recruit Legally Qualified Chairs (LQCs) and Independent Panel Members (IPMs) for police misconduct panels</li> <li>Nominate a chair and lay member from the pool to sit on panels</li> <li>Nominate a tribunal judge and independent lay member (where appropriate) for police appeals tribunals and run the process</li> </ul>	<p>Assessment: Compliant</p>
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## Overview

### *Police misconduct panels*

The London region panel for LQCs and IPMs is run by MOPAC. The Police Authority was involved in the recruitment process and makes a financial contribution to the service. The Police Authority selects the chair and panel, and the force runs the process. When selecting the panel, the Police Authority considers availability and spread of work across members. Where police misconduct panels are being conducted under old regulations, COLP selects the chair and panel (via the Police Authority).

### *Police appeals tribunals*

The Police Authority selects a tribunal judge from a national list, and secures a chief officer from another force and COLP. The Police Authority runs the process including sourcing a venue.

## Recommendations

<p>The Authority should negotiate an agreed protocol with COLP for handling the logistics of any Police Appeals Tribunal, including venue, facilities (e.g. recording equipment) and assistance with escorting panel members, legal teams, witnesses and members of the public</p>	<p>October 2022</p>
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## Emerging policy

- In 2018 a concern arose regarding the indemnity wording agreed with LQCs. As a result, most LQCs are refusing to sit on misconduct panels until the wording of their indemnity is changed. The National Association of Legally Qualified Chairs (NALQC) is looking for reasonable immunity from suit and is not prepared to settle for indemnity alone. The Home Office will only consider indemnity against costs arising from suit and will not consider immunity. Most PCCs are providing an indemnity for the next 2 years although NALQC is concerned PCCs are not evidencing they can afford the indemnity. Many LQCs are approaching the end of their 8 year term so there is likely to be difficulties in recruiting. The Police Authority's position has been to write to an LQC when needed, offering them indemnity for the case.
- Under the new Race Action Plan, panel chairs will be required to undertake anti-racism training, and there will be an assumption of seeking panel members from an ethnic minority where race is considered a factor, or the officer is from a visible ethnic minority.

6. Respond to HMICFRS and Home Secretary within 56 days of publication of HMICFRS inspection reports

Assessment: Non-compliant

### Overview

This is an important part of providing assurance that the Police Authority is scrutinising COLP's delivery of policing services. Comments of the Police Authority and Commissioner must be published within 56 days of publication. If the report includes a recommendation, the Police Authority response must include an explanation of:

- the action the Police Authority has taken or proposes to take in response to the recommendation
- an explanation of why the Police Authority has not taken or does not propose to take any action in response

To streamline this process, HMICFRS established an online recommendations register enabling the Police Authority to enter their response direct to the database. The database is also accessible to the Home Office, satisfying the requirement to respond to the Home Secretary. The Police Authority Team has now secured access to this register.

More generally, there is scope for the Police Authority Team to take a more proactive role in monitoring upcoming inspections and engaging with HMICFRS.

### Recommendations

Implement processes with COLP to improve planning for and responding to HMICFRS inspections	September 2022
Incorporate compliance monitoring within Police Authority KPIs	Autumn 2022

### Emerging policy

NPCC recently decided PCCs should no longer be involved in HMICFRS set-up meetings and hot debriefs. The timescale / process for implementation of this is not currently clear. The role of the Police Authority will need to be clarified and agreed with COLP for upcoming inspections.

7. Publication of specified information on PCC performance and force performance and Freedom of Information Act (FOIA) scheme	Assessment: Partially compliant
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### Overview

PCCs are required to publish certain information to allow the public to hold them to account. The Elected Local Policing Bodies (Specified Information) Order 2011 ('the Order') sets out the information that must be published. An amendment to the order came into force on 31 May 2021 requiring that information relating to the force's performance against the Government's national priorities for policing, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) performance reports on the force, and complaint handling must also be published. The Amended Order specifies this information must be published in a prominent place on the Police Authority's website.

There is partial compliance with the Specified Information Order 2011 and Amended Order 2021. As the Police Authority is not a legal entity and is part of the wider Corporation, it is not appropriate to publish all of the information set out in the Order at a departmental level. However, given the aim of the Order is to improve transparency and public accountability, there are opportunities to improve the information provided. A high level analysis of the gaps can be found at Appendix 2.

The Police Authority is recruiting a Strategic Communications & Engagement Coordinator who will be responsible for updating and maintaining the website.

The Police Authority is covered within the Corporation FOIA information scheme [Freedom of Information Act 2000 - City of London](#).

### Recommendations

Review and update the police authority website to ensure compliance with the Statutory Information Order and Amended Order where appropriate and improve accessibility of information by the public	December 2022 (dependent upon recruitment)
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<p>8. Engage with the public including:</p> <ul style="list-style-type: none"> <li>○ consulting on setting police and crime objectives</li> <li>○ engaging on budget proposals annually</li> <li>○ obtaining views of victims of crime</li> </ul>	<p>Assessment: Partially compliant</p>
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## Overview

Public engagement is an element of the PCC role linked to improving public confidence. Community engagement is currently led by COLP. With the recruitment of a Strategic Communications & Engagement Coordinator and Analyst, there is scope for the Police Authority to step up its engagement and understanding of its communities.

Effective community engagement requires insight into the demographics of the community and which channels they engage with. It requires monitoring which groups are engaging with current processes, which groups are under represented, and implementation of action to ensure all voices are heard.

There is a lack of understanding within the Police Authority of its community profile, beyond generic groups (residents, workers, businesses etc) and volumes. This means it does not have a clear understanding of whether it is hearing all its communities, making it challenging to ensure diversity and inclusion is embedded within its decision making.

Public engagement is fragmented across the Corporation. Data sits across multiple departments with no central repository or analysis. At an organisational level, there is no professional lead for analytical capabilities or a clear business intelligence / data strategy.

Officers in the Corporation are currently working on a new community engagement strategy for Policy & Resources Committee. This is primarily to achieve improved turn out for elections but will inform a broader engagement strategy. The strategy will include recommendations on segmentation, targeting (channels), and monitoring and data requirements. The Police Authority team has fed in its requirements and will engage with this process as it is developed.

### *Setting police and crime objectives*

See section 1 above. The main mechanisms for local public engagement and consultation on police and crime objectives are force-led cluster panels and an annual community survey which informs the Policing Plan. These are led by COLP. There is Member representation on Police Authority governance boards and it is expected that they represent the views of their Wards. The Safer City Partnership also engages with the local community on its priorities.

### *Engaging on budget proposals*

The Police Authority does not consult on budget proposals unless there is a new impact on local taxation (ie increase in Business Rate Premium). Budget proposals are scrutinised through Police Authority Board and its Resources, Risk & Estates Committee, which are public meetings. Budget information is published in the Annual Report and Policing Plan. It is considered that the current level of engagement on budget proposals is sufficient.

There is also a requirement to publish its reserves policy. This is being developed (see section 15) and will be published on the PA website in due course.

### *Obtaining views of victims of crime*

Victim surveys are undertaken by COLP and reported through Police Authority governance. The main mechanism for engagement with the City's national communities is through Action Fraud and, currently, the Next Generation Fraud and Cyber Reporting & Analysis Project. The Police Authority is not involved in this.

### Recommendations

Establish capabilities to improve understanding of the size and demographics of the different community groups across the City, ensure information about local communities/protected characteristics needs and outcomes is regularly updated and used to inform the Police Authority's equality objectives and other priorities	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Develop and implement an inclusive community engagement strategy, including systems for monitoring which groups COLP and the Police Authority are engaging with, and which groups are underrepresented, making recommendations for remedial action when required	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Work with Corporation colleagues to coordinate engagement activity to enable community views to be captured using a range of different channels and information to be shared across all relevant departments	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Develop a joint victim strategy with COLP including how the Police Authority captures views of victims	Autumn 2022

### Emerging policy

- As a result of the PCC Review there is a desire for PCCs to work with their communities to foster greater public confidence in the police. The core PCC guidance will be amended to reflect the PCC role in securing and maintaining public confidence in policing and tackling crime and anti-social behaviour. This will require the Police Authority to take a more proactive and structured approach to its engagement, and draw on best practice for engaging communities and building public confidence.
- The Draft Victims' Bill proposes creating a duty for specified criminal justice bodies and PCCs to take into account victims' experiences

9. Secure the maintenance of an efficient and effective force (including value for money) and hold the Commissioner to account	Assessment: Compliant
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### Overview

The formal governance of the Police Authority is through the Police Authority Board, which reports to the Court of Common Council. The Police Authority Board has four committees:

- Strategic Planning & Performance
- Resource, Risk & Estates
- Professional Standards & Integrity
- Economic and Cyber Crime

An overview of the current standing agenda items is attached at Appendix 3.

The Police Authority has a range of mechanisms including:

- Public accountability meetings through Police Authority Board and its Committees
- Private accountability meetings through Police Authority Board and its Committees
- Formal reports through Police Authority Board and its Committees (requires review)
- Attendance by police authority staff at police governance / scrutiny meetings (requires review against new governance structure)
- Weekly private informal meetings between the Police Authority Chair, Director of Police Authority and Chief Officer Team
- HMICFRS reports
- Policing Plan performance framework
- Value for money (financial framework)

Assurance is through a combination of Member scrutiny and officer engagement. In line with the internal audit recommendations, the Police Authority is establishing a professional development programme for Members to assist them in their role. A training needs assessment will be undertaken. The Police Authority Team will engage with the Association of Police and Crime Chief Executives and College of Policing to develop their own professional development programme.

Police Authority scrutiny is reliant on the quality of information provided by COLP which is improving. The Police Authority Team is recruiting an analyst which will enable a more data-led and evidence based approach to assurance and decision making. For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need to focus on strategic issues.

Specific areas of focus for PCCs set out in the Police & Social Reform Act (PSRA) and the Police Authority oversight mechanisms linked to this are set out below.

<b>PSRA Requirement</b>	<b>Oversight mechanism</b>
Duty to have regard to the Police & Crime Plan	SPCC / Policing plan measures
Duty to have regard to Strategic Policing Requirement	SPCC / Policing plan measures
Duty to have regard to codes of practice issued by Secretary of State	Requires review further analysis
The effectiveness and efficiency of arrangements for co-operating with other persons (whether under section 22A of the Police Act 1996 or otherwise)	Annual ethical partnerships paper provided to PAB. Potential gap in respect of London regional collaboration
The effectiveness and efficiency of engagement with local people	Requires further analysis
Exercise of duties relating to equality and diversity	<p>Primarily delivered through PS&amp;IC. Focus on understanding disproportionality linked to use of powers and scrutiny of delivery of Equality and Inclusion Strategy. Gaps in understanding of disproportionality linked to police misconduct / complaints, victim support and commissioned services - in part due to data limitations.</p> <p>A self-assessment against the APCC Equality Framework which was developed to help PCCs hold Chief Constables to account and improve public trust, indicates the Police Authority is at the low end of the maturity scale (developing) for understanding and working with its communities. This impacts its ability to understand disproportionality. The assessment for leadership and organisational commitment showed it was achieving against some areas of the framework but there is still scope for improvement in others.</p>
Exercise of duties in relation to the safeguarding of children and the promotion of child welfare that are imposed on the chief constable by sections 10 and 11 of the Children Act 2004	<p>SPPC / Policing Plan measures around multi-agency safeguarding plus HMICFRS</p> <p>Multi-agency safeguarding is governed through Children and Community Services. Agenda items such as the annual reviews of the safeguarding boards should be considered for PAB.</p>



The Police Authority should take more of an active role in setting the forward plan and agenda for its governance boards and committees, in collaboration with COLP. This should include regular review of the governance framework and benchmarking against statutory requirements and good practice by other police oversight bodies.

For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need.

### Recommendations

Professional development programme for Police Authority officers and Members to improve ability to understand and scrutinise policing	Autumn 2022
Review scrutiny framework and standing agenda items to Police Authority Board and its Committees against statutory obligations, and benchmark against other police oversight bodies	October 2022
Implement processes for future agenda planning for Police Authority Board and its Committees	October 2022
Map Police Authority officer attendance across COLP governance to ensure appropriate representation at internal scrutiny meetings	October 2022
Develop and extend the financial assurance framework submitted to Police Authority Board in January 2021 to cover wider assurance around efficiency and effectiveness and value for money	Spring 2023 (linked to new national guidance and good practice)
Develop a plan based on the APCC equality framework and Race Action Plan to improve delivery of equality objectives and scrutiny including consideration of how the authority engages with independent advisory scrutiny groups	Autumn 2022

### Emerging policy

The recent PCC review highlighted challenges in understanding performance and efficiency. The Home Office has committed to working with HMICFRS and the wider policing sector to develop a police efficiency dataset and improve the ability to interpret differences between forces to help drive efficiencies. This was highlighted in the Internal Audit report.

## OTHER RESPONSIBILITIES

PCCs have a range of roles beyond oversight of policing. These are linked to crime prevention and community safety.

<p>10. Community safety partnerships (CSP):</p> <ul style="list-style-type: none"><li>• the PCC and CSP must have regard to each other's priorities within their plans. This should encourage joint working on mutual priorities, and ensure that the PCC priorities are tackled at the local level, and the CSP priorities are reflected and resourced</li><li>• the PCC has a power of accountability over CSPs, they can call in representatives of CSPs in the force area to a meeting to discuss strategies to reduce crime</li><li>• the PCC can request a written report from a CSP</li><li>• PCCs can approve mergers between CSPs (many have already merged), but cannot dictate mergers</li><li>• PCCs can make grants to CSPs for the reduction of crime and disorder (but are under no obligation to do so)</li></ul>	<p><b>Assessment:</b> Partially compliant</p>
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### Overview

#### *Priorities*

The Police Authority is a member of the City's community safety partnership, known as the Safer City Partnership (SCP). The SCP new strategy has been developed having regard to the Policing Plan priorities. The Policing Plan does not reference how it has considered the SCP priorities. The most recent public consultations on priorities for the Policing Plan and SCP were undertaken independently of each other.

#### *Structures and accountability*

The focus of the Police Authority has been primarily on policing with the Community Safety Team in the Department for Children & Community Services taking the lead on crime prevention. The Police Authority cannot be assured policing is efficient and effective and its community is safe unless there is a focus on crime prevention. This extends beyond COLP.

The Police Authority should take a more active role in influencing prevention of crime and anti-social behaviour, bringing it more in line with the PCC approach and government policy ambitions to further strengthen the role of PCCs in this area.

While most force areas span multiple local authorities, integration of local authority community safety and police functions are much less complex in the City. Having the Police Authority and Community Safety functions under combined leadership could improve the overall effectiveness of both functions and bring crime prevention higher up the Corporation's political agenda and priorities.

The Police Authority team is developing a closer working relationship with the Community Safety team. It has agreed to share its analytical and strategic communications and engagement resources to support the work of the Community Safety team to provide a more integrated approach. The Police Authority team will have a seconded police officer who will have specific responsibility for crime prevention and community safety, working as part of the SCP.

The SCP governance has recently been reviewed. The Crime & Disorder scrutiny board has oversight of the SCP. It is Member chaired and should include a Police Authority Board Member. There is a Strategy Group which is officer chaired (COLP). The Police Authority is represented on this group. Thematic delivery groups aligned to the SCP priorities will also include Police Authority officers.

### *Grants*

The Police Authority has historically awarded 10% of the funding it receives through the Proceeds of Crime Asset Recovery Incentivisation Scheme to the SCP to be used at the discretion of the SCP. The SCP has allowed its members to bid for the money, as well as community groups who support SCP strategic priorities. There has been limited accountability to the Police Authority for the use of these funds.

The SCP is professionalising its approach to management of the funding process. It has established a panel with its statutory partners, chaired by the Director of Police Authority to make decisions on how the funding is awarded. A funding strategy is being developed in consultation with partners which will take into account of the deliverables within the new SCP strategy. The SCP will use the Corporation Central Grant Unit to manage its grants.

### Recommendations

Bring together the two separate processes for consulting the public on SCP and policing priorities to reduce consultation fatigue and maximise the reach of consultation engagement – this may require synchronisation of planning and publication timetables	To be implemented for the Policing Plan refresh commencing in 2023
Police Authority Board should commission an annual report from the Safer City Partnership	Incorporated into PAB standing agenda items (September 2023)
Develop a new approach to allocation of ARIS funds to SCP and improve transparency of how it is used	Winter 2022/23

### Emerging policy

- The PCC review seeks to strengthen the role of PCCs in bringing together partners to prevent crime. A review of community safety partnerships has been commissioned to identify how partnerships can increase their overall effectiveness to better protect their local communities from crime and anti-social behaviour. PCCs are likely to campaign for greater influence over these bodies.
- The new drugs strategy requires the establishment of local combating drugs partnerships from 1 August 2022 in which it is expected there will be police and PCC representation. This is in addition to community safety partnerships.

### Overview

The Police Authority Chair was consulted on the community trigger procedure when it was set up, and arrangements are in place for them to be consulted whenever the procedure is reviewed.

There is scope for PCCs to be directly involved in the community trigger, for example by:

- auditing case reviews
- providing a route for victims to query the decision on whether the threshold was met or the way a community trigger review was carried out
- Monitoring use of the community trigger to identify any learning and best practice

Within the current process, the Police Authority is not directly involved in the community trigger.

### Recommendations and emerging policy

Through the review of community safety partnerships, the Home Office is considering introducing a new duty for these partnerships to report on local anti-social behaviour strategy and delivery to PCCs. It is also considering legislating to set out the PCC role in the Community Trigger process. It is recommended that the role of the Police Authority in the community trigger is reviewed at this time.

## Overview

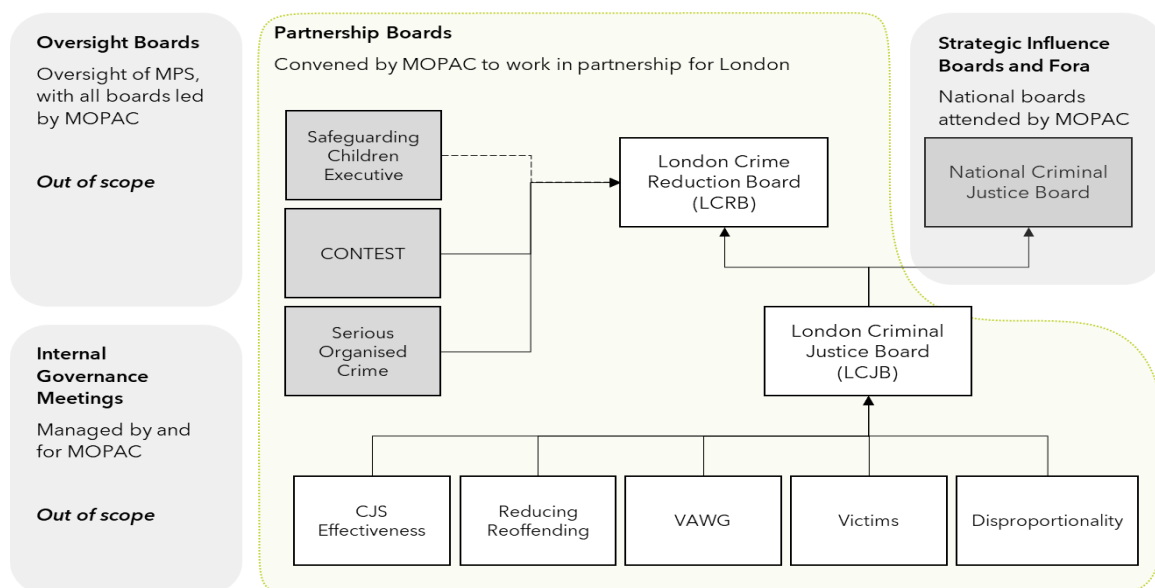
The City does not have its own Local Criminal Justice Boards. It is included within the London Criminal Justice Board (LCJB). London criminal justice data covers both City of London and the Metropolitan Police area. The Police Authority is not represented on the London Criminal Justice Board. This has previously been chaired by the Metropolitan Police and COLP has been represented.

MOPAC is developing a new approach to the LCJB and intends to chair a strategic board with partners to improve crime and justice outcomes for London by:

- Setting strategic direction and coordinating system-wide partnership action for improving the London criminal justice system
- Providing a senior partnership forum under the London Crime Reduction Board
- Overseeing other partnership boards
- Defining a performance framework aligned with the London Police and Crime Plan and the National Criminal Justice Board for criminal justice partnership work.

To do this, the board will:

- Agree, coordinate, and monitor partnership activities
- Define a single performance framework informed by the Police and Crime Plan to guide the strategic coordination of the partnership boards
- Delegate and refer criminal justice issues as necessary to other boards or partners
- Monitor partnership board progress on performance indicators
- Monitor and report on crime and justice outcomes and related partnership activities to the London Crime Reduction Board
- Provide a connection with the National Criminal Justice Board and national issues.



Given putting victims at the heart a Policing Plan priority, the LCJB will be responsible for overseeing COLP compliance with the Victim Code of Practice (see below), and MOPAC provides victim services commissioning on behalf of the City, there would be benefit in the Police Authority being represented within this governance.

### Recommendations

Engage with MOPAC to understand how the Police Authority should be represented in its pan-London governance	Autumn 2022
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### Emerging policy

- Following the PCC review options for legislation to put Local Criminal Justice Boards on a statutory footing are being explored. This includes defining the role of the PCC as Chair and setting out the expected membership (including the Crown Prosecution Service, Her Majesty's Courts and Tribunals Service and the Probation Service).
- The draft Victims Bill places a duty on PCCs and local criminal justice bodies to review compliance with the Victims' Code of Practice. The duty is placed on local criminal justice bodies to enable PCCs to take the role of overseeing compliance with the Victims' Code within each police area. This effectively makes MOPAC responsible for monitoring COLP compliance with the Code, as chair of the LCJB. Consideration will need to be given to how Action Fraud fits within this scope and creates a more compelling reason for the Police Authority to be represented on the LCJB.

<p>13. Commission victim support and crime reduction services:</p> <ul style="list-style-type: none"> <li>• Victim support</li> <li>• Reducing re-offending</li> <li>• Serious violence</li> <li>• Crime prevention</li> <li>• Alcohol and substance misuse services</li> <li>• Early intervention</li> <li>• Community safety</li> </ul>	<p>Assessment: Partially compliant</p>
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## Overview

The Police Authority does not directly commission victim support or crime reduction services and does not have commissioning capabilities. Some of the above services are commissioned through Police Authority partners.

Funding for commissioning of these services is usually from the PCC budget but can also be funded through government grants.

The Corporation's over-arching commissioning strategy for victim support and crime reduction services is unclear. Oversight of commissioned services is fragmented across departments or does not exist.

The Community Safety team commission the following services, none of which have permanent or sustainable funding:

- Anti-social behaviour controls – Parkguard was first commissioned to help the City Estates (excluding the Barbican which did not make an economic contribution). The Citywide contract was trialled for a year. The Community Safety team would like to extend the service to run in the night time economy hours as well (after 00:00).
- Bangladeshi victim advocate – 4% of the City's population is Bangladeshi. This is a 3 day a week contract with Solace to help and support victims of domestic abuse or other violence against women and girls in the City, to address circumstances where language and culture can be a barrier when reporting and accessing services.
- Counselling for victims of domestic abuse and rape – a service to address an issue where victims of domestic abuse and sexual violence had to wait more than 6 months to access counselling from the NHS. There are 10 places for victims in the City of which 6 have already been used.

The Community Safety team is exploring safe accommodation for domestic abuse victims. There are no perpetrator or early intervention programmes.

Alcohol and substance misuse services are commissioned through the City and Hackney partnership managed by DCSS.

COLP funds a part time vulnerable victim advocate for local victims of domestic abuse. It also receives funding to provide support services to victims who report to Action Fraud and is rolling out delivery of this service to all police forces.

MOPAC receives funding to commission pan-London victim services and they commission some other services which are available for City residents such as the Independent Domestic Violence Advisor service (awaiting full list). The Police Authority has no oversight of these services meaning it cannot be assured they are meeting the needs of its victims. MOPAC is currently developing a new approach to victim services commissioning and has committed to engaging with the Police Authority as part of this process.

Recommendations

The Police Authority should engage with partners to ensure a holistic strategy for commissioned services and implement processes to assure services are meeting the needs of the community and local crime profile	Spring 2023
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Emerging policy

- Under the new Police, Crime and Sentencing Act, out of court disposals will change from current 6 tier model to 2 tier only. This essentially scraps cannabis warnings, PNDs, FPNs and simple cautions, and moves to diversionary and community cautions only. At present the target date is 1 April 2023.

The new diversionary and community cautions will require conditions to be attached, which should be rehabilitate or reparatory. The purpose being to divert offenders away from the criminal justice system and deal with root cause of offending and recidivism. As such, the City will require a selection of diversionary programmes to offer as conditions. There may be opportunity to commission on a pan-London basis. The Police Authority and COLP have engaged with MOPAC, MPS and the British Transport Police. It is not clear how this will be funded.

- The draft Victims Bill:
  - Places a duty on specified authorities (including local authorities, PCCs and Integrated Care Boards) to collaborate with each other when commissioning victim support services to facilitate more holistic and better coordinated victim support services
  - Defines Independent Sexual Violence Advisors (ISVAs) and Independent Domestic Violence Advisors (IDVAs), introduces guidance setting out recommended minimum standards and best practice for ISVAs and IDVAs, and place a duty on ISVAs, IDVAs and other persons whose functions relate to victims of criminal conduct, or any aspect of the criminal justice system, to have due regard to this guidance, and how this relates to their role



## FINANCIAL RESPONSIBILITIES

14. Hold the police fund and other grants from central and local government and set the local policing precept	Assessment: Compliant
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### Overview

Police funding is held within the City Fund. There is no local policing precept in the City.

15. Financial strategy: <ul style="list-style-type: none"><li>• Translate the PCC's plans and priorities into a viable medium term financial strategy</li><li>• Ensure funding is available from grants, precepts and reserves</li><li>• Ensure a robust annual budgeting process that enables financial balance and monitoring</li></ul>	Assessment: Compliant
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### Overview

A Chief Finance Officer is responsible for the financial strategy. It has been a shared role with the force since February with the intention for this pilot to run through to summer / autumn 2023, followed by review with consideration to formalise. Police Authority independence is maintained by having the Chamberlain retain the role of Police Authority Treasurer.

The core focus of the Police Authority has been in relation to the core grant. There is opportunity for greater transparency and strategic direction from the Police Authority in relation to new funding strategies and opportunities, national lead force funding and receipts from the Asset Recovery Incentivisation Scheme (ARIS).

The Police Authority has a financial assurance framework established in January 2021. It covers medium term financial planning, revenue and capital budget setting, budget monitoring / out turn reporting, value for money assessment and financial control and management capabilities.

The police budget is subject to Finance Committee approval and quarterly monitoring as part of the City fund. Its Efficiency and Performance Sub-Committee does an annual deep dive on police. The capital budget and loan funding is subject to the scrutiny and approval of OPPSC and RASC.

The City Fund is subject to audit as part of the Corporation's wider financial assurance and police funding is covered within the Audit Committee.

## Recommendations

The Police Authority to work with COLP and the Community Safety team to agree its strategic approach to tracking and managing new or recurring funding opportunities including private sector funding and government grants	Winter 2022/23
The Police Authority to establish a governance framework for allocation of ARIS funding across COLP and the SCP	Winter 2022/23
The Police Authority to bring forward a more detailed and formalised reserves policy and publish on its website	Autumn 2022

## Emerging policy

The Home Office is reviewing the police funding formula. The Police Authority is leading engagement with the Home Office in collaboration with COLP both from a local perspective and to ensure fraud and cyber crime are appropriately recognised in the formula. Due to the change in Ministers this is now unlikely to be implemented for the next settlement.

## APPENDICES

### Appendix 1: Internal Audit Recommendations and Actions

Ref	Recommendation	Action	Progress
1.	The Police Authority should implement a programme of self-assessment exercises to determine the extent to which its governance and oversight arrangements meet the requirements of the Policing Protocol Order 2011.	<p>The Director of the Police Authority has broadened this recommendation to incorporate other statutory instruments that define the duties of Police &amp; Crime Commissioners.</p> <p>This self-assessment has been completed and will be presented to Police Authority Board in November 2022. The duties contained within it will form a base for regular review of how the Police Authority is complying with all its duties, including governance and oversight arrangements.</p> <p>As legislation affecting the roles and responsibilities of policing and PCCs continues to evolve, the Police Authority is implementing a structured approach to horizon scanning to enable it ensure it is effectively planning to capture and implement new and changing requirements.</p> <p>This document will be reviewed and updated annually and has been incorporated into the Police Authority Board future agenda. The next review will be reported in November 2023.</p>	Completed
2.	The Court of Common Council's Standing Orders should be revised to reflect the Court's legal power and duty to remove the Commissioner of Police, where required.	<p>This recommendation was based on Internal Audit's review of the Policing Protocol 2011 which states that a "<i>PCC has the legal power and duty to:.... (f) remove the Chief Constable subject to following the process set out in Part 2 of Schedule 8 to the 2011 Act and regulations made under section 50 of the Police Act 1996(3);</i>". However, Schedule 8 does not apply to the City of London.</p> <p>The power to remove the Commissioner is contained within the City of London Police Act 1839. The removal of the City Police Commissioner is governed by section 3 which states "<i>...and Her Majesty, or the Court of Mayor and Aldermen, may remove the said Commissioner, if She or they shall see</i></p>	To commence following development of new national policy

		<p><i>Occasion so to do, for Misconduct or other reasonable Cause</i>". However, it does not detail the process that should be followed.</p> <p>The recent PCC Review recognised there is a lack of transparency and rigour to current processes for suspending or removing chief constables and committed to legislate to amend Section 38 of the Police Reform and Social Responsibility Act 2011, to make the Chief Constable dismissal process more rigorous and transparent, by requiring a PCC to give the Chief Constable written notice (including grounds), as the first stage of the dismissal process; allowing for the Chief to provide Her Majesty's Inspector of Constabulary Fire &amp; Rescue Service a response to those grounds; and introducing some form of time limit or review interval on a Chief Constable's suspension from office. The Home Office also intends to work with the College of Policing, NPCC and APCC to develop a framework for the use of independent mediation in appropriate circumstances.</p> <p>To align with national developments, the Director of the Police Authority will review this recommendation once nationally-led work to legislate and develop processes for removal of chief constables has been completed and make recommendations for implementation.</p>	
3.	The Police Authority's Financial Framework should be enhanced by adopting the Home Office's proposed approach for assessing the efficiency of Police Forces, as identified from its review into the role of Police and Crime Commissioners.	This recommendation will be implemented when Home Office guidance is published.	Awaiting Home Office guidance
4.	The Police Authority should align arrangements for reviewing the risk registers for both the Police Authority Board and City of London Police, with the requirements of the City's Risk Management Policy and Strategy.	Risk registers for the Police Authority and COLP will be reported to RREC quarterly and have been incorporated into the future agenda plan.	Completed

5.	Police Authority Officers should support the Police Authority Board and its Committees in undertaking a skills and experience assessment audit, developing a training plan to address any identified gaps.	Under the Civic Affairs Committee, a rolling learning and development programme for all Members covering the knowledge and skills required to assist them in conducting their role as Committee Members and Ward Councillors is being developed. The Police Authority is contributing to this programme by identifying the knowledge and skills required for the Police Authority Board and its Committees.	In progress. To be completed by October 2022
6.	The Police Authority should explore the extent to which the City of London Corporation should operate a Local Criminal Justice Board.	<p>The City is included within the London Criminal Justice Board led by MOPAC. London criminal justice data includes both City of London and the Metropolitan Police area and it is not always possible to disaggregate. This approach has been confirmed as appropriate by the Association of Police and Crime Commissioners and the Home Office.</p> <p>The Police Authority is engaging with MOPAC to discuss the role Police Authority on this board. This action is covered in the Police Authority review highlighted in recommendation 1 above.</p>	Completed
7.	The Police Authority should establish an appropriate framework through which the City of London Police can report to Members on the extent to which it continues to comply with the Data Protection Act 2018.	<p>COLP's Information Management Services department oversees the day-to-day governance and compliance requirements of the Data Protection Act (DPA) and its Data Protection Officer is required by law to undertake monitoring and hold the organisation to account for its compliance with the Act. COLP has an Information Management Board which meets quarterly to monitor compliance with FOIA and DPA.</p> <p>COLP's Information Management Board will provide an annual dashboard on DPA and FOIA compliance to RREC each May, highlighting any areas of concern or improvements implemented over the course of the year. This has been incorporated into the future committee agenda plans.</p> <p>Findings from internal and external audits (eg Information Commissioner's Office) will also be reported to RREC when available, along with quarterly updates on progress of recommendations.</p> <p>In the event of a data breach resulting in COLP declaring a critical incident, this would be reported to the Police Authority Board Chair and Chief Executive in line with existing practices.</p>	Complete



Appendix 2: Specified Information Order

**Purpose: The public should be able to easily access information on City of London Police performance and the work of the Police Authority Board.** The Amended Order provides that information relating to the force’s performance against the Government’s national priorities for policing, HMICFRS performance reports on the force, and complaint handling must also be published. The Order also specifies that this information must be published in a **prominent place** on the elected local policing body’s website.

Legislation: [The Elected Local Policing Bodies \(Specified Information\) Order 2011 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

Amended: [The Elected Local Policing Bodies \(Specified Information\) \(Amendment\) Order 2021: guidance for police and crime commissioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

REQUIREMENTS	COMPLIANCE
<b>2011 Order</b>	
<p>In relation to the relevant office holders of the elected local policing body—</p> <p>(a)the name of each relevant office holder;</p> <p>(b)the address for correspondence of each relevant office holder;</p> <p>(c)the salary of each relevant office holder;</p> <p>(d)the allowances paid to each relevant office holder in respect of expenses incurred by the office holder in the exercise of the body’s functions;</p> <p>(e)a register of interests of relevant office holders, including every paid employment or office or other pecuniary interest of each relevant office holder.</p> <p>(f)the number of complaints or conduct matters that have been brought to the attention of a relevant office holder by the police and crime panel (either because they have been referred to the Independent Police Complaints Commission, or because they are being subjected to informal resolution by the panel).</p>	<p>Board member details, contact detail and register of interests included in CoL Member pages</p>

REQUIREMENTS	COMPLIANCE
<p><b>2.</b> In relation to the staff (and, in relation to gifts and hospitality, also the relevant office holders) of the elected local policing body—</p> <p>(a)the number of members of the staff;</p> <p>(b)the proportion of the staff who—</p> <p>(i)are women,</p> <p>(ii)are, to the knowledge of the elected local policing body, members of an ethnic minority,</p> <p>(iii)have, to the knowledge of the elected local policing body, a disability (within the meaning of section 6 of the Equality Act 2010(1));</p> <p>(c)an organisational chart showing the structure of the staff;</p> <p>(d)the job title, responsibilities and salary of each senior employee and (unless the senior employee refuses to consent to the publication of his name) the name of the senior employee;</p> <p>(e)a register of each offer of a gift or hospitality made to a relevant office holder or member of staff, indicating whether the offer was accepted or refused.</p>	<p>Does the Corporation publish this information at an organisational level? Not required for authority as less than 150 employees</p>
<p><b>3.</b> In relation to the income and expenditure of the elected local policing body—</p> <p>(a)the total budget of the elected local policing body;</p> <p>(b)where the elected local policing body is a police and crime commissioner, the precept issued by the commissioner;</p> <p>(c)information as to each anticipated source of revenue of the elected local policing body (other than, in the case of a police and crime commissioner, the precept);</p> <p>(d)information as to the proposed expenditure of the elected local policing body;</p>	<p>Included in annual report and plan but not signposted</p>



REQUIREMENTS	COMPLIANCE
<p>(e) a copy of the annual investment strategy of the elected local policing body;</p> <p>(f) information as to each crime and disorder reduction grant made by the elected local policing body, including the conditions (if any) attached to the grant, the recipient of the grant, the purpose of the grant and the reasons why the body considered that the grant would secure, or contribute to securing, crime and disorder reduction in the body's area;</p> <p>(g) information as to each item of expenditure of the elected local policing body exceeding £500 (other than a crime and disorder reduction grant), including the recipient of the funds, the purpose of the expenditure and the reasons why the body considered that good value for money would be obtained.</p>	
<p><b>4.</b> In relation to the property, rights and liabilities of the elected local policing body—</p> <p>(a) the identity of any premises or land owned by, or occupied for the purposes of, the elected local policing body;</p> <p>(b) a copy of each contract with a value exceeding £500 to which the elected local policing body is or is to be a party;</p> <p>(c) a copy of each invitation to tender issued by the elected local policing body in relation to a contract which the body expects will have a value exceeding £500.</p>	<p>Not relevant as PA not a legal entity? What is published at a Corporation level?</p> <p>Probably – at a CoL level – City Fund will have value of assets and lease payments</p> <p>B and C – Aga Watt (procurement)</p>
<p><b>5.</b> In relation to the decisions of the elected local policing body—</p> <p>(a) the date, time and place of each public meeting to be held by the elected local policing body;</p> <p>(b) a copy of the agenda for each public meeting held by the elected local policing body, and any report or other document that is the subject matter of an item on the agenda;</p> <p>(c) a copy of the minutes of each public meeting held by the elected local policing body, and of each meeting which is not a public meeting but at which matters of significant public interest arising from the exercise of the body's functions are discussed.</p>	<p>Compliant</p>

REQUIREMENTS	COMPLIANCE
(d) a record of each decision of significant public interest arising from the exercise of the elected local policing body's functions, whether made by the body at or as a result of a meeting or otherwise.	
<p><b>6.</b> In relation to the policies of the elected local policing body—</p> <p>(a) a statement of the policy of the elected local policing body in relation to the conduct of relevant office holders, including procedures for the handling of qualifying complaints and conduct matters (within the meaning of section 31 of the 2011 Act);</p> <p>(b) a statement of the policy of the elected local policing body in relation to the making of decisions of significant public interest arising from the exercise of the body's functions;</p> <p>(c) a statement of the policy of the elected local policing body in relation to records management, including procedures for the security and sharing of information and the retention and destruction of documents;</p> <p>(d) a statement of the policy of the elected local policing body in relation to the handling of qualifying disclosures (within the meaning of section 43B of the Employment Rights Act 1996(2)).</p>	
<p><b>7.</b> In relation to the prevention of crime and disorder, a copy of any report required by the elected local policing body from the responsible authorities for a local government area under section 7(1) of the Crime and Disorder Act 1998(3).</p>	Not applicable as report not historically required. Future reports should be published.
<p><b>8.</b> In relation to the independent custody visitors appointed under arrangements made by the elected local policing body under section 51 of the Police Reform Act 2002, the identity of each person appointed.</p>	<p>Not compliant. 2018/19 ICV annual report out of date.</p> <p><a href="#">Independent Custody Visiting - City of London</a></p>

REQUIREMENTS	COMPLIANCE
<b>2021 Amended Order</b>	
<p><b>National performance measures</b></p> <p>The intention of these Measures is to complement existing local priorities set out in PCCs' local Police and Crime Plans. Each force has a key role in supporting the Measures, so that collectively we can see real improvements in outcomes over the four years from the baseline of June 2019. It is recognised that not all Measures will apply equally to every force <b>so PCCs must consider how best to apply these measures in their force area.</b></p> <p>The Order requires PCCs to provide a statement on the contribution of their force to achieving improvements against those priorities. We recommend that this statement includes:</p> <ul style="list-style-type: none"> <li>• reflections on force performance and how the force has contributed towards the delivery of the national measures, including contextual information that might help explain that contribution</li> <li>• a summary of planned action for the next quarter to drive the force's performance against applicable measures</li> <li>• an explanation of which of the Measures are assessed to be applicable and which are not applicable in the local context, including the reasons for that assessment</li> </ul> <p>The Order requires that this statement is published at the same time as the Policing and Crime Plan, and that it is reviewed quarterly, and any variation published, within one month following publication of an annual report on the force by HMICFRS.</p>	<p>Out of date. Consider linking to SPPC papers. <a href="#">HMICFRS inspections and performance reporting - City of London</a></p>
<p><b>HMICFRS</b></p> <p>The Order requires that PCCs publish the PEEL report for their force on their website, within one calendar month of its publication by HMICFRS. This may be done by publishing a link. Once HMICFRS publishes its new 2021-23 PEEL report for individual forces, PCCs are to provide a link to this report, within one calendar month.</p>	<p>Link to HMIC website.</p> <p>Infographic not published.</p>

REQUIREMENTS	COMPLIANCE
<p>Under its new PEEL assessment framework HMICFRS will grade each aspect of a force's performance as: inadequate; requires improvement; adequate; good; or outstanding. Alongside a detailed narrative to substantiate its grading decisions, HMICFRS will also include a summary infographic of its assessment of the force's performance against each inspection area.</p> <p>The Order requires PCCs to publish the summary infographic on their website within one calendar month of publication of the HMICFRS PEEL report. Individual force-level infographics will be provided to PCCs by HMICFRS on request</p>	<p><a href="#">HMICFRS inspections and performance reporting - City of London</a></p>
<p><b>Complaints handling</b></p> <p>The Order provides that PCCs must publish the most recent IOPC quarterly complaints data for their force and the IOPC annual statistics report, alongside a narrative setting out how the PCC is holding the chief officer to account, and the PCC's assessment of their own performance in carrying out their other complaints handling functions.</p> <p>The Order requires that the IOPC data and report are to be published on the PCC's website within one month of their publication by the IOPC, and the narrative and assessment are to be published annually, within one month of the date of publication of the IOPC's annual statistics report.</p> <p><b>Holding the chief officer to account</b></p> <p>It is recommended that the narrative should include:</p> <ul style="list-style-type: none"> <li>• how the force is measuring complainant satisfaction</li> <li>• progress updates on implementing relevant recommendations made by the IOPC and/or HMICFRS in relation to complaints handling, or where recommendations were not accepted an explanation as to why</li> <li>• a summary of any mechanisms put in place to identify and act on themes or trends in complaints</li> </ul>	<p>Not compliant.</p> <p><a href="#">Police Authority complaints and reviews (appeals) - City of London</a></p>

REQUIREMENTS	COMPLIANCE
<ul style="list-style-type: none"> <li>• a summary of systems in place to monitor and improve performance in the timeliness of complaints handling</li> <li>• the number of written communications issued by the force under regulation 13 of the Police (Complaints and Misconduct) Regulations 2020 where an investigation has not been completed within a “relevant period”</li> <li>• quality assurance mechanisms in place to monitor and improve the quality of its responses to complaints</li> <li>• details of the administrative arrangements the PCC has put in place to hold the chief constable to account for complaints handling e.g. frequency of meetings and a summary of discussions</li> </ul>	
<p><b>PCC assessment of their own performance in carrying out their other complaints handling functions</b></p> <p>It is recommended that the assessment should include:</p> <ul style="list-style-type: none"> <li>• the timeliness of complaint reviews e.g. the average time taken to complete reviews</li> <li>• details of which review functions the PCC has delegated and what measures they have taken to ensure quality, integrity and impartiality</li> <li>• quality assurance mechanisms the PCC has established to ensure that review decisions are sound and in line with the requirements of the complaints legislation and IOPC statutory guidance</li> <li>• how the PCC assesses complainant satisfaction with the way in which they have dealt with complaints</li> </ul>	<p>Not compliant</p> <p><a href="#">Police Authority complaints and reviews (appeals) - City of London</a></p>

### **Manner of publication**

The amending Order specifies that the new information must be published in a prominent place on the PCC's website. The purpose of this requirement is to make it as easy as possible for the public to access the information. We fully recognise that PCC websites will differ in style and content but recommend that PCCs either:

- provide all specified information directly on the PCC's homepage; or
- clearly signpost this information on the homepage, with links to the relevant location

### Appendix 3: Police Authority Governance (under review)

Committee	May	Jun	Jul	Sep	Nov	Jan	Feb	Mar
<b>Police Authority Board</b>  <i>Quarterly reports</i>  <i>Other</i>	<ul style="list-style-type: none"> <li>Q4 E&amp;I Update</li> <li>Q4 Risk Register Update</li> <li>Q4 Comm engagement update</li> </ul>			<ul style="list-style-type: none"> <li>Q1 E&amp;I Update</li> <li>Q1 Risk Register Update</li> <li>Q1 Comm engagement update</li> <li>Q1 Cap and Rev Budget Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Q2 E&amp;I Update</li> <li>Q2 Risk Register Update</li> <li>Q2 Comm engagement update</li> <li>Q2 Cap and Rev Budget Monitoring</li> </ul>		<ul style="list-style-type: none"> <li>Q3 E&amp;I Update</li> <li>Q3 Risk Register Update</li> <li>Q3 Comm engagement update</li> <li>Q3 Cap and Rev Budget Monitoring</li> </ul>	
	<ul style="list-style-type: none"> <li>Provisional Cap and Rev Budget Outturn (for info)</li> <li>Draft CoLP Annual Report (for info/comment)</li> <li>Strategic Comms &amp; Engagement Annual Plan</li> <li>Appointment of PAB's Committees, Chairs and appointments</li> <li>Court order</li> </ul>	<ul style="list-style-type: none"> <li>MTFP</li> <li>Final CoLP Annual report (for decision)</li> <li>Update on Cap and Rev Budget Outturn (For info)</li> <li>Police Pensions Board Annual Report</li> </ul>	<ul style="list-style-type: none"> <li>Final Annual Cap and Rev Budget out turn (for info)</li> <li>H&amp;S Annual Performance update</li> <li>Modern Slavery Annual Update</li> </ul>		<ul style="list-style-type: none"> <li>MTFP</li> <li>Annual Review of Fees and Charges- For decision</li> <li>ICV annual report</li> <li>PA Annual Review</li> </ul>	<ul style="list-style-type: none"> <li>Draft/ Provisional Budget (for info)</li> <li>Ethical partnerships annual report</li> <li>Draft Policing Plan refresh (for info)</li> <li>Complaints / IOPC annual report</li> <li>Police Authority Business Plan</li> </ul>	<ul style="list-style-type: none"> <li>Final Cap and Rev Annual budget setting (For decision)</li> <li>Policing Plan refresh (for decision)</li> </ul>	<ul style="list-style-type: none"> <li>Terms of reference review</li> </ul>
<b>Strategic Planning &amp; Performance</b>	<ul style="list-style-type: none"> <li>Q4 Performance-v Policing Plan Measures</li> <li>Q4 Community Engagement Update</li> <li>Q4 HMICFRS Update</li> <li>Deep dive: Protective security / Secure City</li> <li>Terms of reference</li> </ul>			<ul style="list-style-type: none"> <li>Q1 Performance-v Policing Plan Measures</li> <li>Q1 Community Engagement Update</li> <li>Q1 HMICFRS update</li> <li>Deep dive: Victims</li> <li>Safer City Partnership Annual Report</li> </ul>	<ul style="list-style-type: none"> <li>Q2 Performance-v Policing Plan Measures</li> <li>Q2 Community Engagement Update</li> <li>Q2HMICFRS Update</li> <li>Deep Dive: Safeguarding and vulnerability</li> </ul>		<ul style="list-style-type: none"> <li>Q3 Performance-v Policing Plan Measures</li> <li>Q3 Community Engagement Update</li> <li>Q3 HMICFRS Update</li> <li>Policing Plan Measures refresh for following year</li> <li>Deep Dive: [ASB / NTE?]</li> </ul>	
<b>Resource, Risk &amp; Estates</b>	<ul style="list-style-type: none"> <li>Provisional Cap and Rev Budget Outturn</li> <li>Q4 Workforce Update</li> <li>Q4 Risk Register Update</li> <li>MTFP</li> <li>Information Security Annual Report</li> <li>Terms of reference</li> </ul>			<ul style="list-style-type: none"> <li>Q1 Cap and Rev Budget Monitoring</li> <li>Q1 Workforce Update</li> <li>Q1 Risk Register Update</li> </ul>	<ul style="list-style-type: none"> <li>Q2 Cap and Rev Budget Monitoring</li> <li>Q2 Workforce Update</li> <li>Q2 Risk Register Update</li> <li>MTFP</li> <li>Annual Review of Fees and charges</li> </ul>		<ul style="list-style-type: none"> <li>Q3 Cap and Rev Budget Monitoring</li> <li>Q3 Workforce Update</li> <li>Q3 Risk Register Update</li> <li>Annual Cap and Rev Budget Setting</li> </ul>	
<b>Professional Standards &amp; Integrity</b>	<ul style="list-style-type: none"> <li>Q4 E&amp;I Update</li> <li>Q4 CoLP Complaints Data</li> <li>Q4 AF Complaints Data</li> <li>Q4 Stop and Search and Use of Force</li> <li>Terms of reference</li> </ul>			<ul style="list-style-type: none"> <li>Q1 E&amp;I Update</li> <li>Q1 CoLP Complaints Data</li> <li>Q1 AF Complaints Data</li> <li>Q1 Stop and Search and Use of Force</li> </ul>	<ul style="list-style-type: none"> <li>Q2 E&amp;I Update</li> <li>Q2 CoLP Complaints Data</li> <li>Q2 AF Complaints Data</li> <li>Q2 Stop and Search and Use of Force</li> </ul>		<ul style="list-style-type: none"> <li>Q3 E&amp;I Update</li> <li>Q3 CoLP Complaints Data</li> <li>Q3 AF Complaints Data</li> <li>Q3 Stop and Search and Use of Force</li> </ul>	
<b>Economic and cyber crime</b>	<ul style="list-style-type: none"> <li>Q4 NLF Performance</li> <li>Q4 Cyber Griffin</li> <li>Q4 Cyber Portfolio update</li> <li>Strategic Comms &amp; Engagement Update</li> <li>NLF / Cyber Annual Plan Refresh</li> <li>Terms of reference</li> </ul>			<ul style="list-style-type: none"> <li>Q1 NLF Performance</li> <li>Q1 Cyber Griffin</li> <li>Q1 Cyber Portfolio Update</li> <li>Strategic Comms &amp; Engagement Update</li> </ul>	<ul style="list-style-type: none"> <li>Q2 NLF Performance</li> <li>Q2 Cyber Griffin</li> <li>Q2 Cyber Portfolio Update</li> <li>Strategic Comms &amp; Engagement Update</li> </ul>		<ul style="list-style-type: none"> <li>Q3 NLF Performance</li> <li>Q3 Cyber Griffin</li> <li>Q3 Cyber Portfolio Update</li> <li>Strategic Comms &amp; Engagement Update</li> </ul>	