

POLICING PLAN PERFORMANCE FRAMEWORK 2022/23

PRIORITY	MEASURE	METRIC	Q1 22/23	Q2 22/23	GRAPH	NARRATIVE Q2	WHO	Q1 GRADE	Q2 GRADE
1.1	Organised Crime Group (OCGs) disruptions are sustained whilst seeking to increase major and moderate disruptions against higher harm OCGs (City based OCGs)	1.1.1 Number of Major Disruptions	0	0	<p>1.1 Organised Crime Group (OCGs) disruptions are sustained whilst seeking to increase major and moderate disruptions against higher harm OCGs (City based OCGs)</p>	<p>Disruptions are currently claimed against OCGs and strategic vulnerabilities (e.g. cyber/firearms/drugs) to provide a record of executive action that is conducted against SOC. They help provide an evidence base for what works in tackling SOC and act as a performance measure of executive action conducted, tactics adopted by the force to disrupt the OCG, measures in place to tackle SOC, and ensuring the force is not only claiming against Pursue but all 4P strands. Disruptions include anything that has a discernible impact on the OCG, including significant cash seizures, arrests of key or peripheral nominals and the sentencing of OCG nominals. The definition of a high harm OCG has been defined as those within the PND bands of 1A - 2B. This measure only focuses on City Based OCGs and does not include strategic vulnerabilities or OCGs that sit within measure 2.5. Therefore these numbers can look very low, but will not be reflective of all work that goes into disruptions OCGs and strategic vulnerabilities. It is proposed that this is widened out and reported as one measure to better understand and monitor disruptions.</p> <p>In Q2 there has been 1 moderate disruption against City based OCGs (noting there are not many that fall under this category) which is the lowest number of disruptions in 4 years.</p>	SPECIALIST OPERATIONS	ADEQUATE	ADEQUATE
		1.1.2 Number of Moderate Disruptions	3	1					
		Number of Minor Disruptions	1	0					
		1.1.3 Number of Disruptions within highest quartile of harm scoring OCGs	0	0					
1.2	Vigilance against terrorism by 'planning, testing and exercising' and 'preparing and engaging' businesses and communities to ensure the City is prepared to respond to Terrorism.	1.2.1 Planning and Testing - Number of events Planned	39	23	<p>1.2 Vigilance against terrorism by 'planning, testing and exercising' and 'preparing and engaging' businesses and communities to ensure the City is prepared to respond to Terrorism.</p>	<p>In Q2, 23 engagement events were planned and carried out. This is a drop compared to Q1, however it is difficult to understand the longer term trends in some of the metrics in these areas as new processes were put in place to enable reporting capability. Whilst slightly more partners have been engaged with, this has reached a much smaller audience than Q1. However, online engagements has seen a much greater number of attendees across 1 big event. Overall, operation lightning reports remain in normal variation above and below the average.</p> <p>Due to the sensitivity of this area, reporting of information will be at a high level and shared on pertinent topics that generated the need for further discussion.</p> <p>1.2.3 Act operational tabletop - The training followed a staged approach from observed suspicious behaviour escalating to a suspect package and finally an MTA. This training identified the need for clear plans considering staff messaging and individual behaviour. National messaging such as Run Hide Tell, the HOT principles for suspect packages. The impact of an event on the workplace, staff welfare and the intrusion of the press.</p> <p>Further observations from additional exercises include;</p> <ul style="list-style-type: none"> - communication during an incident and what information is passed to emergency services - identify and contact organisations in the City that may be targeted by protests prior to any action taking place (in progress) <p>1.2.7 Attended Feedback to capture improvements to preparedness Positive feedback from businesses reporting hostile reconnaissance, with learning around increasing efficiency and timeliness of reporting. This has been addressed via a CTSA/SB briefings and internal processes being reviewed.</p> <p>Overall rating of (Good) In summary this area continues to operate as an Overall Rating of good. This takes into account the current staffing levels and ongoing training within CT which is still ongoing, coupled with the footfall in the City and from Pre Covid activity and move of City Companies to have more flexible home/work patterns.</p>	SPECIALIST OPERATIONS	GOOD	GOOD
		1.2.1 Planning and Testing - Number of events completed	39	23					
		1.2.2 Planning and testing - number of partners engaged with	28	31					
		1.2.4 Prepare and engage - Reach of Attendees	487	285					
		1.2.5 Prepare and engage - number of online courses	3	1					
		1.2.5 Prepare and engage - number of attendees (online course)	24	100					
		1.2.6 Prepare and engage - Operation Lightning reports	29	23					
1.3	Improve the current grading of good to outstanding in relation to the quality and effectiveness of locally delivered Project Servator community engagement and communications	1.3.2 number of project Servator interactions with members of the public	7789	6344	<p>Interactions</p> <p>Deployments</p> <p>Outcomes</p>	<p>Project Servator is a policing tactic that aims to disrupt a range of criminal activity, including terrorism, while providing a reassuring presence for the public. The approach relies on police working with the community – businesses, partners and members of the public – to build a network of vigilance and encourage suspicious activity to be reported. Project Servator has been successful in gathering intelligence that has assisted Counter Terrorism Units across the UK in investigating and preventing acts of terror. It has resulted in arrests for a multitude of offences and is responsible for removing firearms, knives and drugs from the streets.</p> <p>Interactions and deployments have both dropped in quarter 2 compared to quarter 1, but volumes are still falling around the 5 year average. This is likely to have been impacted due to the high number of leavers within the department and the significant abstractions to support mutual aid requests such as the Commonwealth Games. This has moved the team from a three team pattern to a two team pattern, which means abstractions are more impactful across the lower team numbers (abstractions approximately equating to 2FTE). Recruitment and training is ongoing to mitigate the turnover. Whilst fewer arrests have been made in Q2 compared to Q1 however, more intelligence has been submitted.</p> <p>1.3.1. The current grading level for the CoLP is GOOD. This is from their interim QA in May 2021. In 2018/19 it was also GOOD so there is consistency in the performance of this area of business. The grading levels are marked against a list of criteria by the National Project Servator team and is graded against operation, engagement and communications. This is qualitative and quantitative. It is felt the quantitative measures in the policing plan are mostly right, but should also specifically include outcomes from stop and search. In order to be graded GOOD, a force must meet all relevant criteria and show a clear progression in all three elements along with evidence of positive growth of Project Servator throughout the force. From the inspection in May 21, all recommendations for improvements were tracked and monitored against and this has all now been completed and embedded as part of business as usual. This area has recently been reviewed in May 22 and the results will be incorporated once they are available.</p>	LOCAL POLICING	GOOD	GOOD
		1.3.3 number of deployments	472	441					
		1.3.4 outcomes (arrests made)	21	19					
		1.3.4 outcomes (intelligence submitted)	11	20					
1.4	Ensure Police make appropriate use of their powers to tackle and deter Anti-Social Behaviour	1.4.1 Number of ASB calls received	282	292	<p>ASB Incidents</p>	<p>Over the past 4 years, the number of ASB calls received are showing a long term downward trend. This is in line with the results shown from the Telephone Crime Survey for England and Wales (TCSEW). In the current quarter there have been 292 ASB calls received, with a 74% attendance rate which is 3% increase from Q1. Not all calls are always police related and the City works well with the Corporation to ensure the right response to reports of ASB which is not always the Police. This has been sustained again this quarter and would now be considered a stable decreasing trend.</p> <p>City of London Police worked in partnership with City of London Corporation and partners to mark UK's second official ASB awareness week. The week focused on the impact of ASB on young people. There is currently dedicated Ward Officer's tasked with continued effort under Op Luscombe to support homeless persons to reduce begging and associated ASB and to ensure the continued recording and response to homelessness in the City, offering relevant support/referrals where appropriate. They are tasked with addressing poor road-user behaviour (namely cyclists and e scooter riders on pavements and breaching pedestrian crossing signals), as this has been raised by residents as a concern. Drink spiking testing and education piece with drink toppers and new posters to prevent offences on Op Reframe on 30th September.</p> <p>Future plans to sustain this reduction are to continue partnership work with City of London Corporation, provide a welfare zone within NTE hours to provide safe space and police the NTE with both police and City of London Corporation joint patrols</p> <p>CPWs and CPNs still have some data missing between 18/19 and 20/21 and this is being worked through. However the last 6 quarters are reflective of CPWs and CPNs issued. There have been 14 CPWs issued in the last quarter and 3 CPNs. Data for CBOs and Dispersal orders remain outstanding.</p>	LOCAL POLICING	ADEQUATE	GOOD
		1.4.2 Number of ASB calls attended	199	216					
		1.4.2 % of ASB Calls attended	71%	74%					
		1.4.3 Number of CBOs Issued	UNDER DEVELOPMENT						
		1.4.3 Number of CBOs Breached	UNDER DEVELOPMENT						
		1.4.4 Number of CPWs Issued	6	14					
		1.4.4 Number of CPNs Issues	7	3					
1.4.5 Number of Dispersal Orders Used	UNDER DEVELOPMENT								



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THOSE WHO LIVE, WORK AND VISIT THE CITY SAFE AND FEELING SAFE	1.5 Increase the number of positive outcomes from identified repeat offenders	1.5.1 Number of repeat offenders in the last 12 months	183	166		<p>This measure looks at the 'increase the number of positive outcomes from identified repeat offenders'. To be categorised as an offender, this means that you are in receipt of a positive outcome, therefore this measure should always be 100%. For this reason, Q1 was graded as outstanding due to the high positive outcome rate, but this was without the understanding as to how the measure worked. It is recommended that this measure is reviewed, and until such time should move to a no grading.</p> <p>One suggestion is to move this measure towards understanding suspect and offender management within the CoLP as part of delivering the overall priority of keeping those who live, work, and visit the City safe and feeling safe. Within the CoLP there are varying departments who have responsibility for different aspects of offender management, however the management of offenders is the responsibility of all officers and staff across the organisation from operational policing to intelligence resources. Specific departments include the Lifetime Offender Management (LOM) Team, Integrated Offender Management function (IOM), the Public Protection Unit (PPU). Work is ongoing in this area to improve offender management, and this includes within the Daily Crime Meeting (DCM) to ensure tasking is focused within the agenda to include suspects and offenders. Offenders and repeat offenders are also discussed at local management meetings, which feed into the Daily Management Meeting (DMM). The force wide gold commander will drive the DMM, with the highest risk offenders/suspects being prioritised daily. In addition to this, the CoLP is reviewing its current management information reports to ensure accuracy and improved reporting which is significant work that has been ongoing.</p> <p>Work at a local level has been undertaken to improve data quality by ensuring records are correct and accurately reflecting the position of offenders for improved targeting. It is felt that if this area was graded based on the revision of this measure - it would be considered Adequate at this time, noting there are good plans in place to improve suspect and offender management which would bring it up to a good position in the immediate future.</p>	SPECIALIST OPERATIONS	NO GRADING	NO GRADING
		% of offenders that are repeat offenders (12m)	19%	18%					
		1.5.2 Number of Crimes linked to repeat offenders in the last 12 months	483	422					
		% of offender identified crimes that are from repeat offenders (12m)	40%	38%					
		% of all crime that is from repeat offenders (12m)	7%	6%					
		1.5.3 Positive Outcome rate for repeat offenders in the last 12 months	92%	91%					
	1.6 Reduce Neighbourhood Crime	1.6.1 National measure Neighbourhood Crime - volume of burglary Residential, Robbery Personal, Vehicle Crime and Theft from Person Offences	477	498		<p>Q2 is the highest quarter in 5 years and an increase on Q1 into exception. Volumes have significantly changed with the last 5 quarters all above the average and levels higher (+70%) than the 19/20 baseline year (19/20 was set as the baseline year to avoid comparisons to the low volumes seen during Covid), albeit this has reduced from Q1 which was showing an 82% increase. The increase is predominantly being driven by the sustained impact from theft from the person offences. However September has returned to lower levels and back within normal variation (the quarter is impacted by the high volumes in July and August) so this is a positive. No other exceptions are seen in the other areas of Neighbourhood crime, with low levels reported.</p> <p>CoLP has embedded a prevention approach with support of partners in the reduction of neighbourhood crimes. Through the SARA process a partnership and prevention hub is now a key focal point to crime prevention and the development of plans to tackle emerging or current crime types. Partnership support is drawn from business improvement districts (safe and secure portfolios) business crime reduction partnerships and close working with the security industry to create a cohesive approach to community safety. CoLP have recently implemented several platforms that permit the lawful sharing of intel and information in support of crime reduction. Significant focus has also been around safety within the night time economy. Several initiatives funded via home office safer streets have delivered against our policing plan ambitions of being and feeling safe. Specific operations have been stood up against both thefts connected with the night time economy and theft snatches. Both operations have focussed on prevention activities supported by partners (Crime stoppers) with a wider crime prevention plan where we target both City workers and visitors to educate around crime trends and what can be done to keep your property safe. CoLP have now commenced a series of crime prevention roadshows to businesses. CoLP work closely with the MPS in relation to targeting persistent offenders and have seen some good results from recent operations (Operation Orca and Operation Nivern) with the large recovery of phones.</p> <p>Whilst the rate of increase is slowing and some control is being seen in September, the grading remains unchanged until this area moves back into normal variation and sees some stability.</p> <p>Overall positive outcomes are stable compared to the baseline. It is important to note that for outcomes in general City of London Police have been operating higher than the national level for a number of years now, this is a significant achievement and means we have one of the highest positive outcome rate in the Country currently for all crime. The national positive outcome rate at the end of Aug was 10.9%. The CoLP are performing well above this, delivering a positive outcome rate of 18% (Sep22).</p>	LOCAL POLICING	REQUIRES IMPROVEMENT	REQUIRES IMPROVEMENT
	1.7 Reduce Violent Crime	1.7.1 Violent Crime Volumes - Homicide, Violence with Injury, Violence without Injury, Stalking and Harassment, Rape and other sexual offences	309	361		<p>The last 5 quarters have been above the average with an increase in Q2 compared to Q1. Volumes are 7% higher than the 19/20 baseline which is the same as reported in Q1, therefore the difference remains stable. Whilst volumes are above the average, the last three fall more in line with the baseline year and perhaps suggest levels have returned to pre-pandemic volumes.</p> <p>As with the operational activities mentioned within Neighbourhood Crime, these also extend to managing and preventing Violent Crime. There has been significant focus on VAWG and safety in the Night-time economy and several initiatives funded by the home office safer streets funds, have helped to assist with delivering against the policing plan ambitions of being and feeling safe. These included welfare and vulnerability training to NTE venues including hotels, linked to the Ask for Angela campaign. A communications strategy to increase awareness of the online portal Street Safe which allows people to report areas of concern be that for behavioural or environmental issues. Levels of violence for the next quarter are predicted to increase due to the seasonality experienced with this crime type in the City. The Christmas campaign has been brought forward to October to address the predicted increases. In summary this area remains graded as adequate due to overall stable levels compared to the baseline and ongoing activity in this area with plans in place to address the peaks expected.</p> <p>It is important to note that for outcomes in general City of London Police have been operating higher than the national level for a number of years now, this is a significant achievement and means we have one of the highest positive outcome rate in the Country currently for all crime. The national positive outcome rate at the end of Aug was 10.9%. The CoLP are performing well above this, delivering a positive outcome rate of 18% (Sep22).</p>	LOCAL POLICING	ADEQUATE	ADEQUATE
	1.8 Disrupt drugs supply in the City through pursue activity	1.8.1 Positive outcomes for possession with intent to supply	9	13		<p>In the current quarter there has been 5 PWITs offences and 13 positive outcomes which is a 260% positive outcome rate. In some reporting periods there can be more outcomes than offences due to volumes being counted on 'created dates' and outcomes counted on 'outcome date'. This is in line with national reporting standards.</p> <p>There has been a long term declining trend for the volume of drug related intel reports, with the last 5 quarters all below the 5 year average. This largely follows the number of offences identified and has a moderate correlation (0.6). Its possible with less intelligence submissions that this will impact on the ability to identify and disrupt drugs. Or the alternative explanation is that there is less drugs to disrupt. Other indicators are required to better understand the landscape around drugs which could help to answer the question as to whether there needs to be a greater focus on gathering drug related intel. Positively the percentage and volume of drug related intel have both increased this quarter from 100 (10%) to 120 (13%).</p>	SPECIALIST OPERATIONS	GOOD	GOOD
		1.8.2 Volume of Possession with Intent to Supply offences	8	5					
		Positive outcome rate of Possession with Intent to Supply Offences	113%	260%					
		1.8.3 Possession with intent arrests	24	27					
		1.8.4 Volume of drug related intel reports	100	120					
		% of all intel reports that are drug related	10%	13%					
		1.8.5 Amount of seized drugs	UNDER DEVELOPMENT						
	1.8.6 Amount of seized cash	UNDER DEVELOPMENT							



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2. PROTECT THE UK FROM THE THREAT OF ECONOMIC AND CYBER-CRIME	2.1 Prepare, engage and raise awareness across business and communities of threats and risks of economic/cyber-crime measures they can take to protect themselves	2.1.1 Reach of protect events	6,931	6,528		<p>The number of protect events were significantly lower in 2020/21 than previous years as restrictions were imposed due to Covid-19. However, in 2021/22 teams found new ways of engaging with stakeholders and the public, using online events which can reach greater numbers. This recovery has continued, with 6,528 people attending a mixture of 93 online and in-person events in Q1 2022/23. This represents an increase of 17% from the 21/22 quarterly average of 5,598 attendees. Protect engagements during the period included presentations to the Business Fraud Network, TSB Bank, and Charities Against Fraud Group. The NFIB Protect team also supported the Office of Auditor for Australia who wanted to learn more about Action Fraud and the NFIB, and provided training for police officers via the Economic and Cyber Crime Academy Specialist Fraud Investigator course. A Second Business Stakeholder Manager will be in position from 1st November, which will increase the number of events we can facilitate</p> <p>The platform which hosts the Action Fraud Neighbourhood Alerts has been upgraded. This required subscribers and members to be moved across in a phased approach, meaning our reach dropped before being built up again. In July we could reach 352,824 individuals, whilst in September we reached 503,950 individuals. This number is expected to increase as the final members are moved across.</p> <p>Social Media engagement was strong in Q2, despite external communications being paused from 8-19th September due to Op London Bridge. Of note in July was the social media phishing campaign #Reportthephish. This campaign reached a potential audience of 8,434,856 individuals, achieving 35,232,810 impressions. The week following the launch of the campaign the number reports to SERS increased by 27% to 148,520 reports. Although this decreased the following week to 135,906 reports this is still 16% higher than those reported the week before the campaign launched. The reason behind the increased social media reach during the month of September can be attributed to posts from London Mayor Sadiq Khan and E L James (Fifty Shades of Grey author). This related to raising awareness of cost-of-living related scams.</p>	NATIONAL LEAD FORCE	GOOD	GOOD
		2.1.2 Reach of Neighbourhood alerts	708,482	856,774					
		2.1.3 Impressions from Protect social media messaging	27,712,895	68,147,550					
		2.1.4 Percentage of survey respondents who feel better able to protect themselves	90%	0%					
	2.2 To increase the total number of positive outcomes recorded in relation to fraud across the country	2.2.1 National measure - National positive outcomes reported	1,596	1,450		<p>SP extract not yet received, this is presumed due to DROID still not working as expected. Data can currently only be provided until 31 August 2022.</p> <p>2.2.1 National judicial outcome rates are 7.9% for 2019/20, 5.6% for 2020/21 and 4.8% for 2021/22. There are still outstanding disseminations for each year either being investigated or awaiting closure - which means the outcome rate is likely to increase over time and these figures are subject to change.</p> <p>2.2.2 - The COLP judicial outcome rate is 23% for 2019/20, 9% for 2020/21 and 38% for 2021/22, far higher than the national averages. The COLP NFA rate is currently 6% for 2021/22, which is below the national average of 47%.</p>	NATIONAL LEAD FORCE	GOOD	GOOD
		2.2.2 CoLP positive outcomes reported	238	33					
	2.3 100% of Action Fraud cyber crime referrals will be investigated by the City	2.3.1 Number of Action Fraud referrals received	6	14		<p>The end of Q2 saw worldwide media attention on the arrest of an individual for hacking Uber, Rockstar Games, Revolut and Intercontinental Hotels Group. The team were assisted by the NCA & FBI in this investigation. The Pursue team has started a new operation, targeting an individual selling Breached data from a City based peer to peer money lender.</p> <p>Q2 has been a challenge for the unit as it has been unable to replace staff who were abstracted to other departments. This is reflected in a decrease in operational activity from Q1 and Q4. However the department are still able to service demand, albeit at a slower rate. A new DS and two DCs joined the unit in September although two DC posts still remain vacant at the end of the quarter.</p> <p>The Pursue team won the coveted NPCC Cyber Award at September's National Cyber Awards.</p> <p>Referrals are from NFIB rather than Action Fraud; grading is considered GOOD as demand is being met despite the under resourcing issue.</p>	NATIONAL LEAD FORCE	GOOD	GOOD
		2.3.2 Number of Action Fraud referrals investigated	6	14					
		2.3.3 Positive outcomes from FCCU investigations	N/A	0					
	2.4 Economic & Cyber Crime Academy delegate training numbers are increased; with a 90% satisfaction rate	2.4.1 Number of academy training courses	19	19		<p>The ECCA delivered 19 training courses in Q2 which is consistent with the previous quarter and an improvement on the previous year's Q2 as courses were run during August. However, the number of delegates almost doubled, and the courses provided were longer and more in-depth. The plan to increase the number of courses during Q2 was impacted by external factors such as train strikes and the Queen's funeral. Delegate numbers are also increasing, and the Academy now has a better booking system which ensures no spaces are left empty.</p> <p>The Academy delivered two Money Laundering courses and a Victim Care Course to the NCA in July. Other courses delivered included Specialist Fraud Investigator and Bribery courses, along with Virtual Currency Courses attended by CoLP officers and staff. We also delivered an external MOD SFI course. In September the Academy were overseas in Serbia delivering courses to the Serbian Anti-Corruption Agency and Serbian Border Force. This training was aimed at investigators involved in dealing with corruption within the public sector. Other Academy activities included a CPD event on the Fraud Investigation Model (FIM) which attracted 466 attendees.</p> <p>Satisfaction averages fell slightly to 86% for the quarter. Although mostly positive, feedback evaluation has shown that a single feedback form has reduced the scores and was not indicative of the wider group experience. It has also been noted that only 48% of feedback forms were returned during the quarter, and improvement is required to ensure that all delegates are completing the forms.</p>	NATIONAL LEAD FORCE	GOOD	GOOD
		2.4.2 Number of training days delivered	945	1733					
		2.4.3 Number of delegates	221	252					
2.4.4 Number of Delegates who completed the satisfaction survey		138	120						
2.4.4 Percentage of delegates satisfied with the course overall		91%	86%						
2.5 Economic Crime Organised Crime Group (OCGs) disruptions are sustained whilst seeking to increase major and moderate disruptions against higher harm OCGs.	2.5.1 Number of Major Disruptions	3	1		<p>There were 12 disruptions claimed against Economic Crime OCGs in Q1. Of these, 1 was classified as a Major disruption (a Major disruption represents the OCG being impacted at a key player level). In this instance, a key nominal pleaded guilty and was sentenced to 22 months suspended for 2 years, effectively shutting down the OCG. Major disruptions are not claimed until after court hearings and moderation panels, meaning there are a number of major disruptions yet to be claimed due to court backlogs.</p> <p>The 7 Moderate and 6 Minor disruptions relate to arrests of nominals and seizure of monies. A number of new OCGs have also been mapped during the period.</p> <p>There is currently only 1 Economic Crime OCG group that falls within the highest quartile of harm scoring OCGs, and no disruptions were recorded against it this quarter.</p>	NATIONAL LEAD FORCE	ADEQUATE	ADEQUATE	
	2.5.2 Number of Moderate Disruptions	5	7						
	2.5.3 Number of Disruptions within highest quartile of harm scoring OCGs	0	0						
2.6 Maintain our proactive use of legislation in order to freeze, restrain and protect proceeds of crime by City Of London Police.	2.6.1 Number of restraints, cash seizures, confiscations and account freezing orders	31	36		<p>2.6.1 - In Q2 of this year, at 36 instances, activity is in line with the quarterly average from 2021/22. However, there was an overall 54% drop in POCA activities in 2021/22 compared to the previous year. Decreases in POCA activity are being seen nationally and the Strategic Asset Recovery Board is investigating this change.</p> <p>2.6.2 - Throughout 2021/22, the value of these orders also reduced considerably across all measures with the exception of the UK's highest ever account forfeiture of £28.75m in Q3 2021/22. However, the value of Q2 POCA activities was more than four times the value of the previous quarter, at £4,237,017 compared to £793,988. This is in part thanks to a single Cash Detention of £1,500,000 in August, carried out by the Asset Recovery Team.</p>	NATIONAL LEAD FORCE	ADEQUATE	ADEQUATE	
	2.6.2 Value of restraints, cash seizures, confiscations and account freezing orders	£793,988	£4,237,018						

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2.7	Help victims who report to Action Fraud to recover fraud losses through information sharing with the banking sector and support from victim care.	2.7.1 Value of funds recovered (NECVCU)	£23,400	£122,100	 	<p>2.7.1 & 2.7.5 - The number of NECVCU victims with confirmed recoveries, and the associated value of those recoveries is dependent on the victim informing the NECVCU. Since January 2021 NECVCU have supported 86 victims to recover £2,409,301.56. They have also provided additional support to 152 service re-users since August 2018 preventing a possible £2,447,808 being lost to economic crime. Since July 2018 they have recorded only 78 repeat victims (0.03%).</p> <p>2.7.2-2.7.5 - Recall Droid app issues – Recall was down for a significant amount of time as the 'credits' required for it to operate had not been refreshed. There was an issue where Droid was turning the Recall app off in the background every week, the OneDrive link for processing the Excel CSV workbooks was down for over a week. These issues have mostly been resolved, however there are still persistent issues that just cause the process to take longer (additional info section blank, reports reappearing that have already been dealt with). Everything is raised with the Droid service desk as soon as the issues are noted but there needs to be a longer term solution to mitigate the ongoing issues.</p> <p>Overall fraud levels were lower in June, July & August than previous months and the whole year is lower than pandemic levels.</p>	NATIONAL LEAD FORCE	REQUIRES IMPROVEMENT	REQUIRES IMPROVEMENT
		2.7.2 Number of alerts sent to banks - Project Recall	1250	1418					
		2.7.3 Value of alerts sent - Project Recall	£5,637,891	£7,993,933					
		2.7.4 Confirmed savings - Project Recall	£55,169	£27,148					
		2.7.5 Number of victims with confirmed recoveries (Recall and NECVCU)	UNDER DEVELOPMENT						
3.1	To increase the percentage of survey respondents who are satisfied with the Action Fraud reporting service (telephone and online).	3.1.1 Survey responses - online reporting	409	493	 	<p>In Q2, 87,271 confirmation survey hyperlinks were delivered to individuals that reported a crime. 877 (1.0%) of recipients opted to provide satisfaction feedback.</p> <p>The Action Fraud survey indicates that satisfaction with telephone reporting service in Q2 remained stable and within target at 96%. This is in line with Q2 of FY 21/22 which also saw a satisfaction rate of 96%. Negative feedback received in Q2 is largely attributable to frustration regarding increased call wait times. Measures are now in place to address this and overall satisfaction levels in this area remain high over the long term. The technology issues which impacted the distribution of fulfilment letters (which contain the survey) in the previous quarter have now been resolved and response levels have returned to anticipated volumes.</p> <p>Online satisfaction saw improvement in Q2, coming in just above the benchmark at 84% across the quarter, with September noting a high of 86%. September saw the highest response rate, and the higher the response rate, the more confidence there is that the results of representation of those using the service.</p>	NATIONAL LEAD FORCE	ADEQUATE	GOOD
		3.1.2 satisfaction levels - online reporting	80%	84%					
		3.1.3 Survey responses - telephone reporting	340	384					
		3.1.4 Satisfaction levels - telephone reporting	96%	96%					
3.2	Improve satisfaction among victims, with a particular focus on victims of domestic abuse	Number of Surveys that went out (sample size)	779		 	<p>Victim satisfaction looks at responses from victims of crime that have answered the question, "how satisfied were you with the service you received from the City of London Police?". Respondents can provide an answer ranging between 1 = very satisfied and 5 = very dissatisfied. Those that have replied with a score of 1 or 2 represent those who replied with a satisfied response. As there is a delay between crimes happening, the data set being uploaded and the analysis being completed, Q2 is not yet available. Q1 now shows the full results.</p> <p>Whilst Q1 shows the best response rate received so far, unfortunately victim satisfaction surveying does not have a robust sample size to be able to draw any meaning from the results (quarterly or annually). There is little confidence that the results would be the same if repeated. The results currently have extremely wide confidence limits. Qualitative comments could still be used but there are few to conclude any themes in which to focus activities. A number of recommendations have been made in a recent victim satisfaction report and work is ongoing to improve the surveying of victims with a new survey and system being brought in.</p> <p>Domestic abuse victim surveying is now ongoing on a quarterly basis. There are options regarding using the potential new surveying solution to store the results which would be a positive. We hope to have data for this next quarter although due to the low volumes of Domestic Abuse crimes response volumes are likely to be very low.</p>	SPECIALIST OPERATIONS	NO GRADING	NO GRADING
		3.2.1 Survey responses - victim satisfaction	55						
		Response Rate	7%						
		3.2.2 Victim Satisfaction - Treatment	62%						
		3.2.2 Victim Satisfaction - Kept Informed	42%						
		3.2.2 Victim Satisfaction - Overall Service	42%						
		3.2.2 Victim Satisfaction - Recommend	49%						
3.2.3 Survey responses - domestic abuse	UNDER DEVELOPMENT								
3.2.4 Satisfaction levels - domestic abuse	UNDER DEVELOPMENT								
3.3	Ensure multi-agency safeguarding meetings are held, providing a holistic approach to supporting children that come to police attention	3.3.1 At risk children identified and Public Protection Notices (PPNs) are completed in all relevant cases when children come to notice	94	131	 	<p>Child at risk PPNs have been following a long term increasing trend but have seen a sharp increase in Q1 and Q2 with Q2 the highest in 5 years. Its likely this is due to recent training in this area and better identification but it is therefore also better reflecting the number of times children come to notice to the police where concerns are raised and likely shows a genuine increase or improved reflection of the landscape.</p> <p>Multi agency referrals are completed as a priority each day for PPU. Multi agency referrals looks at the reported date of the PPN and the time the PPN review was created. Where PPNs are reviewed within 24 hours when reported on a Monday - Thursday and 72 hours between a Friday and Sunday, they are deemed as conducted within the time frame specified, otherwise they are considered outside of the timeframe specified. With the increase in the volume of child PPNs, the timeliness over the past year has been more variable with the current quarter at 77% within the timeframes specified.</p> <p>PPU will also attend multi-agency safeguarding meetings. Although the number of Child at Risk PPNs have been increasing, the number of safeguarding meetings has dropped in Q2 as less are normally held over the summer.</p>	SPECIALIST OPERATIONS	NO GRADING	REQUIRES IMPROVEMENT
		3.3.2 Multi Agency referrals are conducted within 24 hours (72 hours at the weekend)	93%	77%					
		3.3.3 Police attend multi agency safeguarding meetings	24	10					
3.4	Provide support and advice to female victims of violence, with an aim to reduce the number who withdraw from criminal justice proceedings during the course of the investigation.	3.4.1 Number of female victims of violence; compared to 2019/20 baseline	119	120	 	<p>Compared to the 19/20 baseline there is;</p> <ul style="list-style-type: none"> - an 11% increase in VAWG crimes (VAWG crimes make up 2% more of all crimes) - a 16% reduction in victims withdrawing from the process - a 2% reduction in the positive outcome rate <p>When looking at the trend charts, VAWG crimes have seen 5 quarters above the average, whilst all crime volumes are not yet above the average, violence crimes overall for the CoLP has moved to higher levels than pre the pandemic which is also true for VAWG. When looking at outcomes, its important to note that these figures will change and can look lower in recent months as investigations are ongoing. However positively there is a real improvement with significantly less victims withdrawing over time with a long term improving trend in this area.</p> <p>Overall positive outcomes are stable compared to the baseline. It is important to note that for outcomes in general City of London Police have been operating higher than the national level for a number of years now, this is a significant achievement and means we have one of the highest positive outcome rate in the Country currently for all crime. The national positive outcome rate at the end of Aug was 10.9%. The CoLP are performing well above this, delivering a positive outcome rate of 18% (Sep22).</p>	SPECIALIST OPERATIONS	NO GRADING	GOOD
		VAWG as a % of all Crime	7%	6%					
		3.4.2 Percentage of female victims withdrawing from the process during police investigation compared to 2019/20 baseline	31%	23%					
		3.4.3 Positive Outcome rate for female victims of violence; compared to the 2019/20 baseline	18%	15%					
3.4.4 Number referred to vulnerable victim advocate or similar	22	28							

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PRIORITY	MEASURE	METRIC	Q1 22/23	Q2 22/23	GRAPH	NARRATIVE Q2	WHO	Q1 GRADE	Q2 GRADE
3.5	Quality assure Public Protection Notices (PPNs) to enable effective referrals to partners and timely provision of support to individuals identified as vulnerable.	3.5.1 Number of PPNs submitted	340	427		<p>The volume of PPNs has been increasing over time, with the last 6 quarters all above the average and the current quarter into exception. Its likely that more concerns are coming to notice with the increasing crime rate but also alongside improved identification with awareness training that has been rolled out such as Voice of the Child Training, DA and vulnerability identification training. Currently 66% of PPNs have had a referral to another agency.</p> <p>As part of the performance regime the DI ensures that the DS's are making the right decisions in terms of PPN assessment and referral. All decision making is recorded on the OEL and therefore at the DI's disposal to dip sample.</p> <p>Dip samples are completed as part of the crime scrutiny group and each PPN is quality assured by a DS before any referral. A recordable process is being put in place to identify any PPN's that are substandard and feedback any learning points including trends or repeat individuals. Any PPNs that contain insufficient information are sent back to the reporting officer for further information to be added. The current processes within CoLP is that the DS manage PPN's, this is placing significant demand on the DS's. Alternative options are being considered to have other resources to manage PPN's under the supervision of a DS. This is in the early stages.</p> <p>This area is graded as adequate, whilst it is good that training is likely supporting better identification of when a PPN needs to be submitted, it is also likely a genuine increase and it outstrips capacity to deal with demand in this area. This area is awaiting further information on the results of dip samples and any areas for improvement.</p>	SPECIALIST OPERATIONS	NO GRADING	ADEQUATE
		3.5.2 Number of referrals to other forces/social services	238	280					
		% Referred to other forces/social services	70%	66%					
3.6	Regular monitoring of the Criminal Justice Score Card to ensure that CoLP are above the National Average for improving timeliness, increasing victim engagement and improving quality of justice working with the CPS.	3.6.1 Median days from offence recorded to the police charging an offender (Outcome applied date)	18	17		<p>A Criminal Justice Scorecard is published by the MOJ and Home Office to bring together data from the police, CPS and Courts to look at the timeliness and effectiveness of investigations. It currently covers data up to the end of March 2022.</p> <p>The only data disaggregated for City Police area relates to the time for Crime recorded to police decision.</p> <p>The remainder of data relates to London South CPS and London Local Criminal Justice Board, both of which include Metropolitan Police data and therefore it is difficult to assess COLP performance within this. For these reasons we have included the measures in this performance framework and will assess them against national performance. Of note, as investigations are ongoing all three of these measures will change each month to include historic data and more recent months will likely look lower until outcomes are applied and investigations are finalised.</p> <p>For the police measures we are below the national average from time crime recorded to police decision, albeit our number of cases are significantly lower than other forces.</p> <p>CoLP are doing better than average for the measures linked to victims not supporting police action and victims not providing evidence.</p> <p>CoLP are doing better than average for successful outcomes for offences with specific victims.</p>	SPECIALIST OPERATIONS	NO GRADING	OUTSTANDING
		3.6.2 Percentage of Police Investigations closed because the victim does not support further police action (outcomes 14 & 16)	16%	9%					
		3.6.3 Positive Outcome Rate	19%	15%					
4.1	Learning and development over 90% completion rates for officer safety; and emergency life support training.	4.1.1 Learning and development over 90% completion rates for officer safety	95%	95%		Compliance remains above 90% consistently, due to the consistent performance above the target this area has been graded as Outstanding	CORPORATE SERVICES	OUTSTANDING	OUTSTANDING
		4.1.1 Learning and development over 90% completion rates for emergency life support training.	90%	92%					
	4.2	Learning and development - 100% completion rates for mandatory training including new values, standards & ethics training.	4.2.1 Learning and development - 100% completion rates for mandatory training including new values, standards & ethics training.	UNDER DEVELOPMENT	UNDER DEVELOPMENT	UNDER DEVELOPMENT	The team are working towards the launch of the new Inclusivity programme, taking place throughout November which is to be mandated for all officers and staff. 300 are expected to attend each session and we have a 2-3 hour plan of activity including inputs from guest speakers around our ethics and our culture.	CORPORATE SERVICES	NO GRADING
4.3	Overall engagement score – staff survey – year on year increase over the next three years.	4.3.1 Overall engagement score – staff survey – year on year increase over the next three years.	N/A	66%		<p>The new force staff survey launched 10th October and is aimed at gaining a clearer picture of how officers and staff feel about working for the CoLP, what works and where improvements are needed. 2020 was the last survey, showing a positive shift from the 2017 survey. The force have partnered with a Company call Any-3 who have experience supporting other police forces and government organisations with their staff surveys. As part of the word, detailed results analysis down to team level will be provided. The force will be working with Any-3 over the next three years to ensure an annual survey is delivered and analysed. The survey closed on the 27th October 22.</p> <p>Following the release of results, managers will be expected to discuss these with their teams to discuss the initial findings which will be followed by improvement plans being developed at an area level to help tackle any consistent themes across the organisation. Any consistent themes will be further analysed through a series of focus groups which will be held at a later date.</p> <p>City of London Police had an engagement score of 66% which is calculated using the 5 engagement questions outlined. The engagement score is made up of 5 questions and essentially measures how happy staff are when they are completing the survey. This is considered to be a strong result when looking at other forces. This has been marked as no grading as there is no other data or figures to compare this too currently but this measure will be used consistently throughout the next few years to monitor engagement.</p> <p>In addition to the engagement score the response rate was 64% which is considered to be outstanding. This is a strong response rate and ensure's that the survey is representative.</p>	CORPORATE SERVICES	NO GRADING	NO GRADING

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PRIORITY	MEASURE	METRIC	Q1 22/23	Q2 22/23	GRAPH	NARRATIVE Q2	WHO	Q1 GRADE	Q2 GRADE
4. PEOPLE	4.4 To ensure our workforce better reflects the communities we serve.	4.4.1 The yearly intake of student officers should comprise of 40% of those that recognise as being from a BAME background	No recruitment in this quarter	15%		<p>From the student constable intakes, 15% are from a BAME background. This data is not in line with force ambitions; this is a challenge that is not unique to CoLP and most forces nationally are not meeting their diversity ambitions. The CoLP are employing a number of options in line with our continued Outreach and Comms Strategy, including the following:-</p> <ul style="list-style-type: none"> - Introduced a Positive Action Team with a dedicated focus on increasing numbers of underrepresented groups into Force - Introduced a 'Buddy' system which supports under-represented candidates through the recruitment & onboarding process - Updating the applicant tracking system for student officer recruitment to "Oleoo", rolled out summer 2022, this will make it easier to apply and process candidate applications. - Additional IPLDP pathway added until the end of March 2023 to attract a diverse pool of candidates. - Hosting further open days/webinars specifically for under-represented groups to encourage them to get into a particular field. - All campaigns now have contact details for our Support Networks where interested applicants can discuss any issues on the application process. - The importance of equality and diversity is prominent on our website. - A broader advertising strategy has been implemented which ensures wider and specific advertising for all campaigns. 	CORPORATE SERVICES	REQUIRES IMPROVEMENT	REQUIRES IMPROVEMENT
		4.4.2 The total number of new joiners to CoLP each year is at least 51% female	31%	25%		<p>As well as the initiatives outlined above we are looking at ways to retain and develop staff and officers within the CoLP. The force has continued to run the PALS development programme every year, which is offered to all under-represented groups. This programme has been created to develop and retain officers and police staff from under-represented groups. The force's Learning & Organisational Development Team will continue to implement new developmental programmes for all under-represented groups, and these are being developed with the support of Staff Support Networks and specialist advisors.</p> <p>4.4.2. This metric looks at police officers, police staff, specials and volunteers. In Q1 22/23, 31% of joiners were female. This has seen a drop in Q2 with 22% police officer joiners being female and 47% police staff female joiners. There were no joiners for specials and volunteers. Due to the number of police officer joiners that brings the overall rate down to 25%, a drop from last quarter of 6%. The 12 month rate on average is 32% so a drop on what is expected.</p> <p>The CoLP are employing a number of options to increase female representation within intakes, including:</p> <ul style="list-style-type: none"> - Placing job adverts to target particular groups, to increase the number of applicants from underrepresented groups. This could include part time, flexible working and job share adverts as we know more female officers apply for this than male ones. Increasing targeted advertising on popular female social media platforms. - Including statements in job adverts to encourage applications from under-represented groups, such as 'we welcome female applicants' 			
		4.4.3 To achieve an overall increase of 2.6% per year of female representation across the service.	36%	36%		<p>4.4.3. Currently 36% of the workforce is female and this has not changed over the longer term. As part of the E&I Strategy the CoLP are looking at ways it can retain and develop staff and officers, providing opportunities to those from under-represented backgrounds. For example:</p> <ul style="list-style-type: none"> - We are offering shadowing or mentoring to groups with particular needs. This would also be expanded to assistance with promotion preparation for anyone with protected characteristics at underrepresented ranks. - We are offering training or internships to help certain groups get opportunities or progress at work. This would include input from the women's network and other staff associations. 			
5. RESOURCES	5.2 User experience: We will ensure that we engage with our employees, to understand user productivity and overall business process efficiency, in order to drive the successful utilisation of IT/Estate/Fleet assets toward business outcomes. Staff survey question 'I am well equipped to do my job'.	5.1.1 Achieve a 100% ULEZ compliant fleet (excluding the horse box); by 2023.	82%	82%		<p>The CoLP owned fleet is currently 82% ULEZ Compliant, and on track to meet the 100% (not including the horsebox) by the time the exemption runs out in 2023, subject to manufacturers delivering vehicles on time. There is no historic data as it wasn't measured previously. The number has been increasing as the fleet has been replaced with ULEZ compliant vehicles.</p>	CORPORATE SERVICES	GOOD	GOOD
		5.2.1 User experience: We will ensure that we engage with our employees, to understand user productivity and overall business process efficiency, in order to drive the successful utilization of IT/Estate/Fleet assets toward business outcomes. Staff survey question 'I am well equipped to do my job'.	SURVEY CURRENTLY LIVE			<p>The new force staff survey launched on the 10th October and is aimed at gaining a clearer picture of how officers and staff feel about working for the CoLP, what works and where improvements are needed. The last survey was carried out in 2020 which showed a positive shift from the 2017 survey. The force have partnered with a Company call Any-3 who have experience supporting other police forces and government organisations with their staff surveys. As part of the work being undertaken by Any-3 they will provide a detailed results analysis down to team level. The force will be working with Any-3 over the next three years to ensure an annual survey is delivered and analysed. The survey will close 27th October 22 and results will be available from November. Following the release of results, managers will be expected to discuss these with their teams to discuss the initial findings which will be followed by improvement plans being developed at an area level to help tackle any consistent themes across the organisation. Any consistent themes will be further analysed through a series of focus groups which will be held at a later date.</p> <p>Within the 2020 Survey the most relevant question to this measure was "I am well equipped to do my job". "Average scores for confidence in job skills were high for police officers and very high for police staff. Both police officer and police staff respondents on average indicated feeling high levels of responsibility to bring about improvements and changes in the workplace, to correct problems, and to deal with issues."</p>			
		5.3.1 Digital Investigation training delivered across the service for all investigators; over the next 12 months.	N/A	9%		<p>The first module of Op Modify (Improving Digital Thinking) has been rolled out with a current 9% completion rate. The biggest take up has been in Specialist Operations who currently have an 18% completion rate, followed by NLF (9%), Corporate support (7%) and Local Policing (4%). It is expected that all relevant roles will have completed this by 31st December. Further modules will be uploaded in due course which will again be made mandatory. Completion of this training has started and will be monitored to ensure the deadline is met.</p>			
6.1 Audit inspections – high risk – implement 90% of audit recommendations within the deadline, increase the percentage of internal audits rates as adequate and above.	Number of recommendations raised	36	CORPORATE SERVICES	NO GRADING	NO GRADING				
		Number of recommendations Implemented				18			
		Number of recommendations Outstanding				18			
		% Outstanding				50%			



POLICING PLAN PERFORMANCE FRAMEWORK 2022/23

PRIORITY	MEASURE	METRIC	Q1 22/23	Q2 22/23	GRAPH	NARRATIVE Q2	WHO	Q1 GRADE	Q2 GRADE																
6. EFFICIENT AND EFFECTIVE SERVICE	6.2 Increase in percentage of people who agree COLP provide an effective service.	6.2.1 Increase in percentage of people who agree COLP provide an effective service.	N/A	N/A	<p>The % of People who agree the CoLP provide an effective service</p>	<p>Within the 2021 Community Survey conducted by the CoLP, there were three additional areas added to question 12 to establish benchmarks of performance of perception, the question was as follows: The CoLP is responsible for law enforcement in the City of London. The police force responsible for law enforcement in the rest of London is the Metropolitan Police Service - a separate organisation. Thinking about if you were to have contact with the CoLP, how much do you agree or disagree with the following statement? "The City of London Police provide an effective service". The results of this questions showed that 29% of respondents strongly agreed and 31.5% tended to agree, providing an overall score of 61% of respondents agreeing to a varying extent that the City of London provides an effective service. As this was a new measure there is currently no historical data to compare to. Work is currently ongoing regarding surveying conducted by the CoLP to bring multiple surveying elements into one place. This means currently there is no recent information on this measure and there are some risks in collecting and analysing the data within the timeframes required to support and inform intended workstreams. There are also some risks regarding the intended solution.</p> <p>There is currently a national YouGov live survey asking the question "generally speaking do you think the police are doing a good or bad job" with each wave attracting up to 1820 responses. This has been tracking since July 2019 and shows a long term declining trend in those who think the police are doing a good job from 70% to 50% (Sept 22).</p>	CORPORATE SERVICES	NO GRADING	NO GRADING																
	6.3 Improve timeliness to deal with public complaints	6.3.1 Improve timeliness to deal with public complaints			<p>Average number of working days to finalise complaint cases by quarter</p> <table border="1"> <thead> <tr> <th>Average number of working days to finalise complaint cases</th> <th>Force</th> <th>MSF Average</th> <th>National</th> </tr> </thead> <tbody> <tr> <td>Outside of Schedule 3</td> <td>12</td> <td></td> <td>27</td> </tr> <tr> <td>Under Schedule 3 (inc suspension)</td> <td>54</td> <td></td> <td>111</td> </tr> <tr> <td>Under Schedule 3 (not inc suspension)</td> <td>47</td> <td></td> <td>106</td> </tr> </tbody> </table>	Average number of working days to finalise complaint cases	Force	MSF Average	National	Outside of Schedule 3	12		27	Under Schedule 3 (inc suspension)	54		111	Under Schedule 3 (not inc suspension)	47		106	<p>This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled informally and those that are handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made. Complaint cases with 'invalid dates' have been removed from the data shown. Please refer to the IOPC website performance framework counting rules and calculations on the for an explanation of invalid dates.</p> <p>Data is not yet available for the current reporting period. Therefore a bulletin covering the period 01 April 2021 - 31 March 2022 has been used to start to look at performance in this area. Whilst it looks like timeliness has been increasing, this is still much lower than the national average</p>	TRUST AND CONFIDENCE	NO GRADING	GOOD
	Average number of working days to finalise complaint cases	Force	MSF Average	National																					
Outside of Schedule 3	12		27																						
Under Schedule 3 (inc suspension)	54		111																						
Under Schedule 3 (not inc suspension)	47		106																						
6.4 Crime Data Integrity - Completeness of Violent Crime recording; to sustain a rate above 90%.	6.4.1 Crime Data Integrity - Completeness of Violent Crime recording; to sustain a rate above 90%.		87%	90%	<p>Crime Recording Compliance</p>	<p>This is an audit of CADs with a first opening code of 1. This code combines Violence Against the Person (VAP) and Public Order (PO) offences. CADs will be counted if the review shows that a crime within the VAP category, or a victim-based PO offence (s.4 or 4A Public Order, or the Racially/Religiously based equivalents) is required. Results are based on the number of these crimes recorded as a percentage of the number required under Home Office Counting Rules criteria.</p> <p>For quarter 1, there is a compliance rate of 87.3%. Whilst September's audit has not yet been completed, July and August show an improved compliance rate of 90%. A rating of 90% is likely to receive a grade of Adequate or Requires Improvement in a CDI inspection, however the grading would be worse if the assessment is that the missed crimes relate to serious offences. As positive improvement is being made in this area and the most recent audit findings are in line with the aspiration of achieving 90%, this area has been graded as adequate. Further improvements or being able to sustain performance would see this grading move into good.</p>	CORPORATE SERVICES	REQUIRES IMPROVEMENT	ADEQUATE																

