Committee(s): Strategic Planning and Performance Committee	Dated: 5 September 2023
Subject: HMICFRS Deep Dive – Force areas 'Requiring Improvement'	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police Pol 78-23	**For Information**
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Summary

This report provides an overview of progress on areas for improvement identified in the 2022 Police Efficiency Effectiveness and Legitimacy (PEEL) inspection of His Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS).

A number of actions have been implemented and/or are in progress to address the areas for improvement and good practice by other forces is being identified in key areas.

Progress is being monitored and assured through internal reality testing, engagement with HMICFRS, and an Operational Improvement Board chaired by the Assistant Commissioner Ops & Security which is also attended by the Director of Police Authority and HMICFRS Force Liaison Officer.

Recommendation

Members are asked to note the report.

Main Report

Background

1. City of London Police has five areas currently graded as requires improvement:

   - Preventing Crime and Anti-Social behaviour
   - Managing Offenders and Suspects
   - Disrupting Serious Organised Crime
   - Tackling Workforce Corruption

- Strategic planning organisational management and value for money

2. This report provides an overview of work to address these areas for improvement since the inspection in 2022.

Current position

Preventing crime and anti-social behaviour

3. Area for improvement: The force should develop a strategy for providing neighbourhood policing with a governance framework that will improve performance.

- A Neighbourhood Policing & Engagement Strategy has been drafted and will be published in September following feedback from key stakeholders including HMICFRS.

- Governance has been strengthened through a new performance framework to be overseen by a new neighbourhood policing delivery board reporting to a new joint local policing and specialist operations performance meeting.

- The number of dedicated ward officers has been increased from 9 to 18 increasing and the shift pattern was changed to respond to changes in offending times and days

- Neighbourhood policing officers are no longer being abstracted from their core role unless there is a critical incident or for extraordinary circumstances to allow capacity for prevention activity. Cluster meetings have been reinvigorated, these are now chaired by neighbourhood Chief Inspector ensuring clear lines of governance and visibility of leadership tot he community.

4. Area for improvement: The force should routinely review problem-solving plans and make sure good practice is shared with staff as part of a lessons-learned approach.

- The force has directly addressed the concerns raised in this area for improvement, an analyst has been recruited into the partnership and prevention hub and the hub is nearing full strength.

- The City has developed a robust approach to problem solving since the 2022 PEEL inspection, dedicated ward officers are trained in the use of neighbourhood problem profiles. With clear reporting lines and governance implemented for officers, this is subject to review and will be reinforced with the strategic business planning process. The Force has developed a repository to store problem solving plans on the sharepoint system.

- This training has allowed the neighbourhood team to deliver a robust response anti-social behaviour seen in the City, Op Luscombe is a successful example

of how tiered problem profile has been used to tackle prolific begging in the City.

5. Area for improvement: The force needs to ensure that neighbourhood policing officers have access to training relevant to their role.

- A continuous professional development programme to improve prevention and problem solving skills has been completed.

- This includes supporting Dedicated Ward Officers to achieve the Level 2 Problem Solving Award for Practitioners in Community Safety & Crime Prevention with all officers expected to be qualified by the end of 2023.

- Bespoke problem-solving training was rolled out to all neighbourhood and frontline officers in Q1 of 2023.

- A force wide training needs analysis will be commenced for September 2023 across all role profiles.

Managing offenders and suspects

6. Area for improvement: The force should ensure that it has an effective system for monitoring how registered sex offenders (RSOs) are managed.

- City of London Police currently manages two RSOs. A new process has been implemented within the Public Protection Unit for the governance of RSOs. Regular meetings are chaired by a Detective Chief Inspector who oversees performance against set measures such as home visits, and risk management plans.

- Four staff have been trained in the use of the ViSOR (Violent Sex Offender Register) providing sufficient resource and resilience for management of both registered sex offenders based in the City

- Processes have been implemented so all court warrants and orders received by the Public Protection Unit are reviewed by a sergeant and inspector for risk assessment and action.

- Fortnightly governance meetings have been implemented to review management of high-risk offenders and address any concerns around court warrants.

- Governance for management of offender court mandated orders and warrants has been informed by learning from Bedfordshire Police (graded outstanding)

- The size of the Public Protection Unit has been increased from 13 officers to 18. This has provided further resilience within the unit for managing high harm offenders.

7. Area for improvement: The force should make sure that it has appropriately trained staff to undertake the grading and management of child abuse images.

- A Child Abuse Image Database (CAID) IT system to manage child abuse images, has been fully implemented with all relevant staff trained in its use.

8. Other relevant activity:

- Other improvements to daily management of offenders are in progress. This includes adoption of more consistent processes for management and grading of risk across departments, and more robust governance processes.

Disrupting serious organised crime (SOC)

9. City of London Police has two local areas for improvement and one regional recommendation.

10. Area for improvement: Except for cybercrime, the force has recorded low levels of serious and organised crime disruption.

- CoLP is reviewing its disruption recording processes to identify if any corrective action is required to ensure all disruptions are being captured effectively.

11. Area for improvement: City of London Police needs to improve its understanding of drug markets and the threat from modern slavery and human trafficking.

- Modern slavery, drug crime, human trafficking and child sexual exploitation have been made priority areas for intelligence development for 2023 as part of the business planning process.

- A prevention programme at two schools within the City has been implemented to raise awareness of county lines offending among young people, offering a channel for the community intelligence on this activity.

- A Modern Slavery and Human Trafficking (MSHT) awareness campaign will be rolled out to ensure frontline officers are able to identify of the signs of this crime type.

12. Regional Recommendation: The Metropolitan Police Service (MPS), British Transport Police (BTP) and the City of London Police (CoLP) should create a single sensitive intelligence unit (SIU).

- City of London Police is engaging with the Metropolitan Police and British Transport Police on the regional recommendation. Work to define how a regional sensitive unit would operate, considering local and regional needs, is currently being scoped. Advice from HMICFRS has been sought to clarify the requirements of the recommendation.

Tackling workforce corruption

13. City of London Police has one area for improvement which covers both vetting and counter corruption:

13.1 The force has a clear understanding of the level of vetting required for all posts and that all personnel have been vetted to a high enough level for the posts they hold;

13.2 The force has a clear understanding of the vetting required for all non-police personnel and that all non-police personnel have been vetted to a high enough level for their role;

13.3 The vetting unit has sufficient staff to meet the demand it faces;

13.4 The force has a comprehensive process for the workforce to report changes of personal circumstances and when such changes are reported, the vetting unit carries out suitable enquiries;

13.5 The force has current policies relating to notifiable associations, business interests and gifts/hospitality and implements them effectively to identify and manage corruption threats.

13.6 When concerning adverse information has been identified during the vetting process, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed written rationale;

13.7 When granting vetting clearance to applicants with concerning adverse information, the force vetting unit creates and implements effective risk mitigation strategies, with clearly defined responsibilities and robust oversight;

13.8 The force analyses vetting data to identify, understand and respond to any disproportionality.

13.9 The force carries out proactive intelligence collection and accurately assesses all corruption-related intelligence;

- A review of vetting levels across all posts will be completed by September.

- Temporary vetting posts have been created to provide a surge capacity to meet extraordinary demand, for example, the police uplift programme and fraud and cybercrime reporting & analysis service project.

- Resources within the vetting unit have been reviewed alongside demand analysis linked to recruitment and re-vetting as part of the Corporate Services Review.

- Recruitment plans for vetting officers and role profiles for all staff and officers deployed to the vetting unit are in place.

- The vetting team carries out reviews on all applicants who fail the vetting process.

- Procedures for reporting business interests, a change in personal circumstances and reporting inappropriate behaviour have been reality tested and meet the national HMICFRS standards and are current for 2023

- The vetting team has carried out a historical review of all misconduct-related reports against officers for the 2019-22 period which exceeds the requirements of HMCFRS

- Basic trend and disproportionality analysis is undertaken but there is scope for improvement. Recruitment of an additional analyst to support this business area has recently been approved. Audit frameworks that align the vetting portfolio to national best practices concerning disproportionality analysis are being developed.

- Resources within the counter corruption team are being reviewed as part of the Corporate Services Review to increase capacity for proactive work

<u>Strategic planning, organisational management and value for money</u>

14. Area for improvement: The force should improve its recording of demand, removing single points of potential failure.

- New processes are being implemented to improve demand analysis linked to the production of the Force Management Statement 2024, incorporating learning from 2023.

- In the coming year we will be implementing an improved data framework for key areas of demand, productivity and performance, and a new process for bi-annual in-depth scrutiny of data through our corporate governance.

- The corporate services review includes proposals for creation of a data hub for exploitation and analysis of data, improved integration of data sources through Power BI, enhanced audit capabilities to improve data quality and management, and a strategic insights capability to support demand management and future planning.

15. Area for improvement: The force should reduce the vacancies in staff and officer positions. These are negatively affecting the service it provides to the public, and the well-being of its staff.

- A three year rolling recruitment plan has been developed covering probationers, police officers, police staff and specials. This recruitment plan will be developed over the coming year to overlay skill requirements.

- City of London Police was one of the few forces to exceed their police uplift targets. Continued recruitment is required to maintain officer numbers. Police officer recruitment and vetting continues to be prioritised in order to avoid financial penalty, alongside recruitment and vetting of police staff in critical roles.

- A police staff recruitment campaign is currently in development and will be launched in October.

16. Area for improvement: The force should ensure its corporate services review improves the service it provides across the force.

- The corporate services review seeks to close key capability gaps that will contribute to improvements in strategic planning and organisational management (as well as tackling workforce corruption).

- Consultation with staff on the proposed designs is scheduled for completion by 27 September.

- Implementation will commence from October supported by the police staff recruitment campaign mentioned above.

Conclusion

17. A number of actions have been implemented and/or are in progress to address the areas for improvement and good practice by other forces is being identified in key areas.

18. Progress is being monitored and assured through internal reality testing, engagement with HMICFRS, and an Operational Improvement Board chaired by the Assistant Commissioner Ops & Security which is also attended by the Director of Police Authority and HMICFRS Force Liaison Officer.

Appendices

There are no appendices to this report.

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