

Committee(s):	Date(s):
Police: Performance and Resource Management Sub Committee	26 th September 2014
Subject: HMIC Inspection update 2014/15	Public
Report of: Commissioner of Police Pol 65/14	For Information

Summary

This report provides an ongoing update to your Sub-Committee on the City of London Police response to Her Majesty's Inspectorate of Constabulary (HMIC) inspection reports as they are published over the course of the 2014/15 financial year. This report provides updates on the following inspections:

- **The Strategic Policing Requirement – Public Order:** a national report that highlighted the high quality of the City of London's Public Order threat and risk assessment; found that nationally, forces have the capacity and capability to fulfil the requirements under the SPR (paras 2-5).
- **Cyber Crime:** the follow up inspection is scheduled for early 2015, in anticipation of which the Force has developed a draft Cyber Crime Strategy and is completing a full gap analysis based on the College of Policing Cyber Crime Toolkit (para 6).
- **The Valuing the Police 4 Inspection:** City of London Police received an overall grading of "Good" with HMIC reassured that the Force had made the necessary savings to meet the funding challenge of the comprehensive spending review and has plans to address ongoing austerity (paras 7-17).
- **Crime Data Integrity:** 10 recommendations made, however, HMIC conclude that Force systems and processes can be relied on to provide effective crime recording (paras 18-21).
- **Making the Best Use of Police Time:** 40 recommendations made by the national report, which does not identify individual forces. Findings in respect of the Force are largely positive (paras 22-26).
- **Stop and search:** an update on the previous submission to your Sub-Committee, principally around the launch of the Voluntary Code of Practice for Stop and Search introduced from 26th August 2014 (paras 27-30).

Additionally, your Sub-Committee's attention is drawn to inspections that have taken place but for which there are currently no reports, and lastly inspections which are due to take place in the near future.

Recommendation(s)

Members are asked to receive this report and note its contents.

Main Report

Background

1. Members will be aware that Her Majesty's Inspectorate of Constabulary (HMIC) conducts a number of assessments of police forces in England and Wales as part of their ongoing inspection programme. This report provides an up to date position on any national recommendations together with any specific City of London Police observations made by HMIC.

Strategic Policing Requirement – Public Order

2. In the previous update report to your Sub-Committee in May 2014 (Pol 41-14 refers), Members were provided with an overview of the national report that HMIC published assessing the extent to which forces were complying with their obligation to support and deliver the Strategic Policing Requirement (SPR). It was noted in that report that two additional national reports were still to be published this year addressing Public Order and Cyber Crime, with the remaining areas covered by the SPR due to be inspected and reported against over the course of the next two years.
3. As the initial national SPR report, the Public Order report is not Force specific. The report was based on documentary evidence and data provided by all 43 forces, supported by fieldwork inspections of 18 forces, which included the City of London Police. It looked in depth at how forces, individually and collectively have responded to the SPR in relation to the threat to public order.
4. HMIC's findings are ordered under the four headings of: Capacity and Contribution; Capability; Consistency; and Connectivity.
 - Capacity and Contribution: HMIC feel that chief constables understand their role to provide PSUs to respond to public disorder across force boundaries and to make a contribution to the national requirement of 297 PSUs. The inspection confirmed that all forces have the capacity to make this contribution. All forces have a public order Strategic Threat and Risk Assessment (STRA); however, whilst the City of London's STRA was highlighted as being particularly good¹, HMIC were disappointed to find that a number of police forces are either still not using the threat assessment process to its full effect or not using it at all.
 - Capability: HMIC found that forces understand the capabilities they are required to have in relation to public order, assisted by the fact that all forces had completed the College of Policing capability framework. Whilst all forces had the equipment necessary to police public order effectively, equipment compatibility between forces was highlighted as an issue (not for London however).

¹ Other forces highlighted as having a robust Public Order STRA were Derbyshire, Dyfed-Powys, Northamptonshire, North Wales and North Yorkshire.

- Consistency: HMIC found consistency was strongest in police regions where PSUs from constituent forces train and exercise together. Joint training and exercising, where the same tactics are used, improves the ability of forces to work together in public order policing (as happens between the City of London Police and Metropolitan Police).
 - Connectivity: HMIC conclude that chief constables are co-operating with the arrangements for cross-boundary mobilisation. However, they also felt that the national response would be more effective and efficient if all regions, except for London where there is a good case for remaining as it is, were to adopt the East Midlands model of a Regional Information Coordination Centre.
5. There were no formal recommendations made within the report for forces to address.

Cyber Crime

6. Further to the update provided in Pol 41-14 to your Sub-Committee; the Force has now developed a Cyber Crime Strategy. Additionally, the College of Policing Development Plan template is being used to conduct a full gap analysis of priority actions that might need to be addressed prior to the next Cyber Crime inspection, which is now scheduled for early 2015 (HMIC had previously indicated it might take place late summer 2014). The Force has already seconded two officers to the National Cyber Crime Unit (NCCU), which will assist significantly with capability and capacity in this area, and consideration will be given to whether a dedicated unit will be necessary to counter the threat to the City or whether the threat can be managed from existing structures and resources.

Valuing the Police 4.

7. Over the past four years, HMIC's "Valuing the Police" programme has tracked how forces have made savings following the government spending review in October 2010. The fourth report in this series "Policing in Austerity: Meeting the Challenge" found broadly that the police have met the financial challenge quite successfully but with further cuts looming, the erosion of neighbourhood policing and the failure of forces to collaborate, concerns for the future remain. The inspection concentrated on three broad questions:
- To what extent is the force taking the necessary steps to ensure a secure financial position for the short and long term?
 - To what extent has the force an affordable way of providing policing?
 - To what extent is the force efficient?
8. Thirty-five forces (including the City of London Police) were judged as having a 'good' response, five² were judged as 'outstanding' with only three³ forces

² Outstanding forces: Avon and Somerset; Norfolk; Lancashire; Staffordshire; West Midlands

classed as 'needing improvement'. No forces were deemed 'inadequate'. The three forces needing improvement will be re-inspected later this year to assess their progress against a recommendation that they urgently review their plans.

9. The City of London Police was placed in the category of forces facing a 'comparatively moderate challenge'. This was due largely to the Force's actions in negotiating additional income streams, effectively reducing the resulting funding gap that needed to be addressed. Representation was made to HMIC that this should not have affected the scale of the original challenge faced by the Force, when in fact the Force should have been lauded for its innovative approach. However, that view was not reflected in the report.
10. The national report made four recommendations. Recommendations 1 and 2 relate solely to the three forces cited as needing improvement. Recommendation 3 is aimed at those forces who have not assumed a level of year-on-year restrictions from 2015/16 will continue at the same rate as those in the current spending review period (does not apply to the City of London Police) and encourages them to revisit the assumptions made in their plans.
11. Recommendation 4 relates to the 20 forces (which includes the City of London Police) that plan to achieve less than 10 percent of their savings in the current spending review period from collaboration, stating those forces should review their plans for increasing savings from collaboration with other organisations in 2015/16 and 2016/17. Forces are expected to revisit collaboration plans between now and October, however, it is difficult to see what might change over such a brief period of time. The City of London Police is not averse to collaboration and is constantly exploring new opportunities to collaborate; Members will be aware of the extensive efforts made as part of City First to collaborate with other forces/organisations in both operational and non-operational areas, however, the Force has made clear that it will not collaborate unless there are compelling operational or financial reasons for doing so.
12. HMIC notes that it has concerns about the ability of 18 forces (which includes the City of London Police) to withstand further reductions. However, when pressed on the matter, HMIC admitted that that view was pure speculation and was based solely on the size of smaller forces and officer numbers. It was not intended as a specific comment on the City's of London's Police's plans to address ongoing austerity or its ability to deliver those plans.

City of London specific report

13. Alongside the national report, HMIC has published a separate report for each police force. In the City of London-specific report, HMIC found that the Force has made good progress in managing financial cuts and continues to deliver effective policing to the City of London. HMIC notes that the Force is building resources to meet its important national role in tackling economic crime

³ Forces requiring improvement: Bedfordshire; Gwent; Nottinghamshire

although there is an attendant future risk given the uncertain financial landscape in which the Force operates. However, HMIC also states there are sound plans for coping with future austerity.

14. Specifically, the reported notes that the Force:

- is on track to achieve its required savings over the spending review period;
- has plans in place to deliver all of the savings needed in 2014/15 including the use of reserves;
- is developing detailed savings plans for 2015/16 and beyond;
- has successfully protected the front line and there are now a greater number of the workforce working on the front line than there were in 2010; and
- has reduced crime over the spending review and has maintained a high level of victim satisfaction.

15. The report notes that in addition to delivering policing to the City of London, the Force also plays an important national role in co-ordinating the country's response to economic crime and fraud. Unlike the national report, HMIC acknowledges that its national lead role has enabled it to develop specialist expertise and attract external funding for specific national economic crime fighting initiatives and operations. Overall, HMIC states the Force understands the issues it faces and is delivering its local and national commitments efficiently and effectively.

16. There were no recommendations made in the report.

17. In future years the Valuing the Police inspections will be subsumed within the annual "All Force Assessment", also known as "PEEL" inspections, where PEEL represents Policing Efficiency, Effectiveness and Legitimacy. The current assessment detailed within this report will feed into the PEEL interim assessment which is due to be published in November 2014 and will incorporate aspects of other inspections that have already taken place this year, including the Strategic Policing Requirement, Core Business and Integrity and Corruption.

Crime Data Integrity

18. In its 2013/14 inspection programme, HMIC committed to carry out an inspection into the way police forces record crime data. All 43 forces were inspected. A full thematic national report is due to be published imminently; however, at the time this report was being developed it had not been published. However, the City of London Police specific report, which is the subject of this update, was published on the 28th August 2014. .

19. One central question was considered as part of this inspection programme:

- To what extent can police-recorded crime information be trusted?

That question will not be able to be answered until the publication of the full, national thematic report as it requires an assessment of crime data and statistics at a national level. The City of London draft report finds that of the 64 incident records examined, 59 crimes should have been recorded. Of the 59 crimes that should have been recorded, 54 were. Of the 54, two were wrongly classified and one was recorded outside the 72-hour limit allowed under the HOCA. 20 calls from the public were also examined. HMIC found that of the 20 crimes that should have been recorded, 19 were recorded correctly. HMIC were reassured that these findings indicate that crime recording by the Force is generally effective.

20. Your Sub-Committee might recall that HMIC published an interim report as part of this inspection programme (Crime Recording, A Matter of Fact), the details of which were submitted to your Sub-Committee in May 2014 (Pol 42-14 refers). There were no matters raised in that report that require an update to your Sub-Committee.
21. The report makes 10 formal recommendations which are reproduced in full at Appendix A. Some of the recommendations will be able to be actioned with little effort (e.g. Recommendation 1 concerning staff awareness of a confidential reporting facility to report unethical crime recording practices); others will require coordination and implementation over a longer period. An action plan will be developed to address the recommendations. Progress will be monitored by Strategic Development and managed by the Data Integrity Board. A copy of the action plan, together with details of progress made against it, will be submitted to your next Sub-Committee.

Making Best Use of Police Time

22. On 4th September 2014 HMIC published its “Core Business” report, an inspection of crime prevention, police attendance and use of police time. It looked at three areas:
 - How well forces are preventing crime and antisocial behaviour;
 - How forces respond to reports of crime, including investigating crime and bringing offenders to justice; and
 - How well forces are freeing up the time of their staff so they can focus on policing functions.
23. The national report, which does not identify individual forces, has made headline news with HMIC finding that some forces no longer routinely attend scenes of crime. The data collected by HMIC as part of this inspection will also inform the interim PEEL assessment, due to be published in November.
24. The report makes 40 recommendations, which are reproduced at Appendix B. Given the date of the report’s publication and your Sub-Committee’s report deadlines, it has not been possible to assess fully all the recommendations and establish the extent to which they might apply to the City of London Police. That piece of work will be done imminently and any resulting action plan will be presented to your next available Sub-Committee.

25. However, HMIC has furnished the Force with their findings in respect of the City of London Police. Those findings, ordered under three headings, are:

Preventing Crime

- The Force is one of the few forces that has an overarching crime prevention strategy.
- There are strong examples of long term crime prevention initiatives being undertaken and the daily management meeting focus staff towards crime prevention activity.
- Whilst the Force does not have a database that would assist with evaluating work and sharing good practice, the Organisational Learning Forum does perform some of those functions.
- Consideration should be given to providing formal crime prevention training to staff who deal with victims of crime and ASB.

Crime Recording and Attendance

- The Force is one of the very few that requires officers to attend all reports of crime and incidents.
- There are clear policies and procedures to identify vulnerable and repeat victims of crime and ASB.
- There are systems in place to identify how many crimes the Force attends.
- There is clear evidence of officers recording updates on the progress of investigations and supervisory oversight.
- The arrangements for the Integrated Offender Management scheme are not as effective as they might be. The Force should aim to standardise its approach to offender management and evaluate the effectiveness of the way it uses the scheme.
- Whilst the Force has an effective way to oversee those suspects wanted for 'priority crimes' (such as burglary or violent crime) there is not the same level of scrutiny for those suspected of other crimes.

Freeing up time

- The Force has a relatively good understanding of demand and is taking steps to build on this.
- The Force is working towards developing a greater understanding of staff productivity.
- The Force is not able to identify the amount of savings in staff time that has been made as a result of changes introduced or new technology it has implemented.
- The use of mobile devices whilst on patrol is limited.

26. The majority of the findings are positive; the Force's response to the ones where changes are required will be considered together with all the recommendations from the national report and reported to your next available Sub-Committee.

Stop and Search Update

27. Previous reports to your Sub-Committee have outlined the remit of the original inspection, the recommendations made and the actions taken by the Force to address those recommendations (Pol 11/14 and 41/14 refer). The last report to your Sub-Committee attached the action plan to provide a comprehensive picture of the then current status of the actions.
28. None of the action plan was graded RED, although a number of actions had been graded AMBER. Progress against the majority of those actions was dependent on the introduction of the Home Secretary's proposals around a voluntary Code of Practice for Stop and Search. The Force signed up to the voluntary code in July and was one of the launch forces in the official national launch of the scheme, which took place on the 26th August 2014. Some of the key features of the proposals include:
- Forces will now record a broader range of stop and search outcomes (whether arrest, caution or any other outcome), and will show a link (or lack of one) between the object of the search and its outcome.
 - Members of the community can be provided with an opportunity to accompany officers on patrol to experience how stop and search is implemented on the street.
 - A reduction in the use of s.60 powers (where stop and search is used in the absence of any reasonable suspicion).
 - A policy change concerning complaints, requiring forces to explain to local community scrutiny groups how powers are being used where a number of complaints have been received.
29. All of the above will be implemented by November, which will effectively close the action plan as delivered. Progress against that deadline will be provided to your next Sub-Committee.
30. Since the last update to your Sub-Committee there has been one meeting of the Stop and Search Scrutiny Group. That group made the decision to commission a mini survey using 'twitter' to capture the views of people who have been stopped in the City or by the City of London Police. The survey will encourage them to share their experiences with a view to making improvements in how the Force conducts stops and searches in the future.

Future HMIC reports

31. A City of London-specific report regarding how well the Force is supporting the Strategic Policing Requirement is expected to be published imminently. (A draft has been received by the Force to comment on matters of factual accuracy, which usually precedes national publication).
32. Since your last Sub-Committee HMIC has completed the third inspection in the series examining Integrity and Corruption in the Police Service. Informal feedback has indicated that there are no significant areas of concern for the Force. A report is expected around November 2014.

33. An Interim Crime Inspection (supporting the Crime Pillar of the PEEL Assessments (see paragraph 17) will take place on 15th September. The focus of the inspection will be victim care and effective crime investigation. Elements of the inspection are also likely to touch on Antisocial Behaviour and Stop and Search. An Interim PEEL assessment is due to be published in November 2014 and will draw on the results of Interim Crime Inspection, the Core Business Inspection and the Valuing the Police 4 Inspection.
34. Full assessments of all the reports will be made to your next available Sub-Committee following their publication.

Conclusion

35. Members should be reassured by the Force's approach and track record for implementing recommendations of HMIC reports. Clear progress has been made in formulating recommendations into action plans and your Sub Committee will be sighted on these plans at the earliest opportunity. Your Sub Committee will continue to provide strategic governance and scrutiny to drive completion of any outstanding actions.

Appendices:

Appendix A- Recommendations from the draft Crime Data Integrity Report.

Appendix B – Recommendations from the Making Best Use of Police Time Report.

Contact:

Stuart Phoenix

Strategic Development

ACPO Directorate

T: 020 7601 2213

E: Stuart.Phoenix@cityoflondon.pnn.police.uk