

Committee(s):	Date(s):
Audit and Risk Management Committee	
Subject: HMIC Inspection Update	Public
Report of: Commissioner, City of London of Police	For Information

Summary

This report provides Members with an overview of the City of London Police response to Her Majesty's Inspectorate of Constabulary's (HMIC) continuing programme of inspections and published reports. It also provides assurance that the recommendations from reports are being addressed by the Force.

During the reporting period (September 2014 – September 2015) HMIC has published ten reports (three being joint reports with other agencies) and one assessment letter:

- Strategic Policing Requirement (Force-specific)
- Undercover Policing (National report)
- PEEL Interim Assessment (incorporating Crime Inspection) (Force – specific)
- Police Integrity and Corruption (Force-specific)
- Integrity Matters (National report)
- Joint Inspection of the investigation and prosecution of fatal road traffic collisions (National report)
- Welfare of vulnerable people in police custody (National Report)
- Stop and search powers 2: are police using them effectively and fairly (National report)
- Joint Review of Disability Hate Crime follow-up (National report)
- Joint Inspection of the Provision of Charging Decisions (National Report) ; and
- Phase 1 assessment of preparedness to protect victims of so-called Honour Based Violence (HBV), Forced Marriage (FM) and Female Genital Mutilation (FGM). (Force-specific assessment letter).

The assessment letter is City of London specific and is based on a desktop inspection (i.e. HMIC did not visit the Force to interview staff or check systems).

This report is supported by Appendix A which provides details of progress against all outstanding HMIC recommendations. The Appendix only reproduces all the recommendations from the most recent reports (i.e. those reported to the last Police Performance and Resource Management Sub Committee on 30th June 2015) together with all outstanding recommendations from earlier reports.

All reports and progress against recommendations are reported in detail quarterly to the Police Performance and Resource Management Sub Committee for scrutiny and oversight.

Recommendation

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

Main Report

1. This report provides Members with an overview of the City of London Police response to Her Majesty's Inspectorate of Constabulary's (HMIC) continuing programme of inspections and published reports. During the reporting period, (June 2014 – June 2015) HMIC, either alone or with other agencies, has published ten reports.
2. Additionally, on 15th May 2015, HMIC wrote to the Force with its draft assessment of the Force's preparedness to protect victims of Honour Based Violence (HBV) following a desk top inspection of all 43 police forces.
3. Appendix A to this report provides an overview of progress against all outstanding HMIC recommendations. All reports and progress against recommendations are reported in detail quarterly to the Police Performance and Resource Management Sub Committee for scrutiny and oversight

Strategic Policing Requirement (Force specific report)

4. This report was one of eighteen force-specific reports. It was a supplementary report to the national report that was previously reported to the Police Performance and Resource Management Sub Committee (Pol 41-14 refers).
5. HMIC found that the Force has the necessary capacity, capability, consistency and connectivity to fulfil its obligations across the five areas of the Strategic Policing Requirement (terrorism, civil emergencies, public order, serious organised crime and large scale cyber attacks). Some comments were made regarding improvements that could be made with respect to cyber crime (which were addressed by the Force's Cyber Crime Strategy), however, the report did not make any formal recommendations for improvement.

Undercover Policing (National Report)

6. The report, 'An inspection of undercover policing in England and Wales', examined the effectiveness of the arrangements in place in all 43 police forces to carry out, manage and scrutinise undercover operations.
7. The report's principal findings were that undercover officers are dedicated individuals that deliver their roles professionally. The essential need for undercover policing was also recognised.

8. The report made a total of 49 recommendations across policies, systems, training and leadership of undercover operations which HMIC felt were necessary to address the inconsistencies and shortcomings identified by the inspection, of these 15 were assessed as being specific to the Force with the majority applied to national lead organisations within this field.

Police Effectiveness, Efficiency and Legitimacy (PEEL) Interim Assessment (Force specific)

9. The PEEL assessment provided a broad assessment of policing over the three pillars of effectiveness, efficiency and legitimacy. Every inspection conducted by HMIC during 2014 in some way contributed to the evidence for the gradings received.
10. HMIC labelled the first assessment as interim because it was based on an incomplete set of inspections. However, HMIC felt that there was sufficient evidence to publish the interim assessment.
11. The website presents a high level narrative judgement for each pillar together with an overall assessment of the Force based on the HMI's professional judgement. Readers are directed to individual inspection reports for detailed findings.
12. The Force received an overall assessment of GOOD. HMIC stated the available evidence indicated that:
 - in terms of its effectiveness, the force is good at reducing crime and preventing offending, good at investigating offending and good at tackling anti-social behaviour;
 - the efficiency with which the force carries out its responsibilities is good; and
 - the Force is acting to achieve fairness and legitimacy in most of the practices that were examined this year.
13. The PEEL assessment did not make any recommendations.

Police Integrity and Corruption (Force-specific report)

14. The *Police Integrity and Corruption* report was the third in a series that began in 2011 when HMIC was formally commissioned by the Home Secretary to consider instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties.
15. Overall, HMIC found that the Force had made good progress on the 3 areas for improvement identified in the previous report and that officers understood values and professional behaviour across the organisation. They found the Commissioner and his chief officer team set high standards in terms of conduct and behaviour and other senior leaders understand their responsibilities to maintain and promote these standards throughout the

Force. They also commented positively on the Force's mandatory e-learning training package ensuring staff had read and understood the Code of Ethics.

16. Whilst HMIC found that the Force actively and effectively identifies and manages threat, risk and harm from corruption, taking all reasonable steps to ensure that organised crime investigations are not compromised, they did feel there were insufficient resources within the counter-corruption unit (CCU) to deal effectively with the flow of intelligence.
17. HMIC only recommended 4 areas for improvement, all of which have been implemented.

Integrity Matters: National Report on Police Integrity and Corruption

18. The report presented a comprehensive assessment of:

- Discovering, investigating and tackling wrongdoing;
- Misconduct and corruption;
- Revisiting police relationships;
- Role of leadership in creating ethical culture;
- Policies and practices to promote integrity;
- Anti-corruption systems and processes;
- Capacity and capability of professional standards departments and anti-corruption units.

19. HMIC's principal findings nationally were:

- The arrangements that forces have in place are in appreciably better shape than when the first reviews into this area were conducted in 2011 and 2012.
- Chief officers are taking seriously issues of police integrity and making tangible progress in creating an ethical culture (chiefly through embedding the Police Code of Ethics).
- Forces are using a wide range of structures and resourcing models for the professional standards and anticorruption departments; they did not consider any one model better than another, recognising that they often reflected local circumstances.

20. The report made 14 recommendations, all of which have been addressed by the Force.

Joint Inspection of the investigation and prosecution of fatal road traffic incidents (National report)

21. This report followed a joint thematic inspection by HMIC and the Crown Prosecution Service. Only six forces and CPS areas were inspected, however, all police forces provided data submissions that informed the final report.

22. The report made 4 recommendations for the police service, all of which the Force was already complying with.

The welfare of vulnerable people in police custody (National report)

23. This report followed a thematic inspection on the welfare of vulnerable people in police custody, including but not limited to those with mental health issues, those from black and minority ethnic backgrounds and children, Only six forces were inspected although all 43 forces provided data submissions to inform the final findings.
24. HMIC made 18 detailed recommendations as a result of this inspection. Of those recommendations, 7 are for police forces to consider and progress, the remainder being recommendations aimed at the Home Office, College of Policing and other agencies.
25. The recommendations are included in Appendix A together with details of work that is progressing to comply with them.

Stop and Search Powers 2: Are the Police using them effectively and fairly (National report)

26. This report assessed progress made nationally since the original 2013 HMIC Stop and Search inspection. All 43 forces were contacted and asked to supply data. Only 6 forces were actually visited by HMIC, City of London was not one of those forces.
27. The report made 11 recommendations. Of those, only 3 are for forces to address directly, the remainder are directed at the Home Office, the National Police Chiefs' Council and the College of Policing either individually or jointly. All the recommendations are included in Appendix A to this report.

Joint review of Disability Hate Crime follow up. (National report)

28. This joint follow up review considered how the police, Crown Prosecution Service and national probation service providers have responded to the 7 recommendations made by the Criminal Justice Joint Inspection (CJJI) review of disability hate crime published in March 2013. 6 police forces were inspected as part of the review; the City of London Police was not one of them.
29. The 2013 review highlighted the need for the 3 agencies to take appropriate steps to ensure that the public and those working in the criminal justice system understood disability hate crime. Of the 7 recommendations made as a result of the 2013 review, 3 were joint actions for all three agencies (at national association level), 1 was directed solely at the police service, 2 were for the CPS and 1 was for the national probation service providers. Only the recommendation relevant to the police is detailed below.

- Forces should review the methods by which information is received from the public to ensure that every opportunity is being taken to identify victims of disability hate crime. The CJI found no evidence that any of the 6 forces inspected had conducted such a review and none routinely scrutinised the means by which victims of disability hate crime chose to report crimes. There have been no reports of disability hate crime made in the City of London since 2011/12 (when there were 2). However, the Force has implemented various measures (including training and awareness campaigns for officers and the public) that will assist in identifying victims of disability hate crime.

Joint Inspection of the Provision of Charging Decisions (National report)

30. The Provision of Charging Decisions report details the findings of a joint inspection carried out by Her Majesty's Crown Prosecution Service Inspectorate (HMCPPI) and HMIC that scrutinised how well the police and CPS ensure quality charging decisions are made. The inspection also looked at progress made since the last full inspection of this area, which was in 2008.
31. The inspectors visited 6 police forces and their aligned CPS areas¹ and examined 650 police and CPS charged cases. The City of London Police was not involved in the inspection.
32. The report made 10 recommendations, reproduced in full in Appendix A. Only 3 recommendations relate to the police service.

Phase 1 Honour Based Violence, Forced Marriage and Female Genital Mutilation Inspection (Force specific)

33. On the 13th May, the HMIC wrote to the Force with a draft assessment of the Phase 1 results from a current series of inspections examining forces responses to Honour Based Violence (HBV), Forced Marriage (FM) and Female Genital Mutilation. The Force was not visited by HMIC, relying instead on a standardised response to a request for data. The assessment was in the form of a letter and no recommendations for improvement were made. However, because HMIC have used a strict, standardised methodology to form the overall assessment, the City of London Police was assessed as not yet prepared across all areas to protect people from harm from HBV. This assessment was challenged by the Force, however, that challenge was not successful.
34. The Commissioner wrote to HMIC to request the assessment is reconsidered as it presents a misleading picture of the actual situation. HMIC responded (verbally) that to maintain a consistent approach to assessments nationally, they did not intend to alter their assessment on this occasion.

¹ Cheshire, Merseyside (CPS Mersey-Cheshire); Devon and Cornwall, Gloucestershire (CPS South West); MPS (CPS London); and South Wales (CPS Cymru-Wales)

35. Phase 2 of the inspection will be on risk based basis and HMIC has already confirmed that the City of London Police will not be inspected.

Appendix

36. Appendix A provides a position statement on progress against all HMIC recommendations. Those recommendations that have been implemented and are GREEN and which have previously been reported to Members of the Police Performance and Resource Management Sub Committee are not included.

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