Committee(s):	Date(s):
Police Performance and Resource Management Sub Committee	31st May 2016
Subject: HMIC Inspection Update	**Public**
Report of: Commissioner of Police Pol 22/16	**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. Since the last report to your Sub Committee HMIC has published 4 national reports and 2 Force reports:

- o **PEEL - Police Legitimacy Report** (national and local report), published on 11th February 2016;

- o **PEEL – Police Effectiveness** (national and local report), published on 18th February 2016;

- o **Missing Children: who cares? The police response to missing and absent children** (national report), published on 23rd March 2016; and

- o **The tri-service review of the Joint Emergency Services Interoperability Principles (JESIP)** (national report), published on 12th April 2016.

This report is supported by Appendix A which provides details of progress against all outstanding HMIC recommendations.

This report additionally includes an update on HMIC's identified areas of interest for 2016.

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, HMIC has published four national reports and one Force report:

    i.   **PEEL - Police Legitimacy Report** (national and local report), published on 11th February 2016;

    ii.   **PEEL – Police Effectiveness** (national and local report), published on 18th February 2016;

    iii.   **Missing Children: who cares? The police response to missing and absent children** (national report), published on 23rd March 2016; and

    iv.   **The tri-service review of the Joint Emergency Services Interoperability Principles (JESIP)** (national report), published on 12th April 2016.

2. Appendix A to this report provides an overview of progress against all outstanding HMIC recommendations.

3. In addition to their inspection reports, HMIC published its annual report into the state of policing in February 2016. This was a summary of all the inspection activity over the year, however, as it a summary of activity that has already been reported to your Sub Committee and was not an inspection itself, it has not been summarised within this report. The report is available on HMIC's website: https://www.justiceinspectorates.gov.uk/hmic/publications/state-of-policing-the-annual-assessment-of-policing-in-england-and-wales-2015/

PEEL – Police Legitimacy

National report

4. On 11th February 2016 HMIC published its PEEL Police Legitimacy 2015 report alongside individual force reports for England and Wales.

5. The top-level police service findings are summarised below:

- The majority of police forces demonstrate fair and ethical behaviour. However, all the good work forces are doing to engage with their local communities risks being undermined if they fail to continue to get Stop & Search right.
- Stop & Search has been examined three times in the last three years. Although there has been some improvement this is still not happening fast enough. Given that Stop & Search is one of the principal indicators of police legitimacy, HMIC found this inexcusable.
- Police use of Stop & Search is declining; officers need to be given the confidence to use the tactic correctly.
- Too many forces are still not recording the reasonable grounds for stopping a person.

- Forces need to do more to demonstrate that they are both using their powers under Stop & Search fairly as well as effectively particularly in respect of BAME and young people.
- Too many forces are not complying with the Home Office and College of Policing Best Use of Stop & Search Scheme (BUSS) despite all Chief Constables having signed up to the Scheme.
- The use of Tasers was fair and appropriate with forces having robust oversight systems in place and well trained officers.
- Disappointment expressed that no significant change in the overall diversity of the police workforce has taken place.

6. The national report contains 4 recommendations of which 3 are applicable to the Force. Details are attached at Appendix A.

City of London Police report

7. The City of London Police received an overall judgement grading of **GOOD**.

8. The key force findings are summarised below:

- CoLP has effectively promoted the Code of Ethics and incorporated the code into its policies and practice.

- The Force has a good understanding of the people it serves. Officers use a range of effective approaches to identify public views engaging with local residents and businesses.

- Chief Officers have set clear expectations about the behaviour expected from all members of Force and that officers and staff treat the public fairly and with respect.

- The Force works well to promote the wellbeing of its staff, but on occasions there are delays in accessing the well spoken of Occupational Health Unit.

- Pleased that Force had put in place some measures to improve consistency in respect of complaint and misconduct cases.

- CoLP is not compliant with the Best Use of Stop and Search Scheme.

- Force has an insufficient understanding of the impact of powers on BAME and young people.

- Force does not appear to understand sufficiently the reasons for its apparent high use of Taser against BAME people.

9. Concerning the final three bullet points, the Force has set up a 'Control Measures' working group chaired by the Superintendent Operations (UPD) to address these points. Learning and Development are also scoping the possibility of delivering an NCALT Stop and Search training package to relevant staff in consultation with Superintendent Operations (UPD).

Furthermore, paragraphs 44 - 46 of this report detail specific actions that the Force has taken concerning understanding the impact of powers on BAME and young people

10. The Force report contains 5 Areas for Improvement, all of which are included at Appendix A.

PEEL - Police Effectiveness Report

National Report

11. On 18th February 2016 HMIC published its PEEL Police Effectiveness report alongside individual force reports for England and Wales.

12. The top-level police service findings are summarised below:

- Broadly the public should feel confident that the police service is good at preventing crime and anti-social behaviour.
- Effective practice in focusing on prevention – successful prevention work needs to be the work of the whole workforce, every day (not just the responsibility of neighbourhood policing teams).
- However, considers there to be a significant risk that prevention work is being limited, reduced or weakened in some forces (due to abstractions and changes to neighbourhood models).
- Risk to prevention work also impacted by uncertainty over future numbers of PCSOs.
- Forces should assure themselves that they are dedicating adequate resource to neighbourhood work, and that time for prevention activity is protected within this.
- Forces are mostly good at tackling serious and organised crime (generally better at 'traditional' organised crime such as drug dealing rather than so called new areas such as child sexual exploitation and cyber crime).
- ROCUs and forces need to increase regional collaboration and ensure greater consistency in services provided (refer to recommendations in ROCUs Inspection Report – Dec 15).
- Serious and Organised local crime profiles are often short on detail and do not include information held by other relevant entities.
- Third of forces judged to require improvement in terms of investigative practices, with backlogs and delays in units which extract and analyse evidence from digital devices a particular concern (note: not the City of London Police)..
- Poorest performance in relation to the care and support for vulnerable victims, including children. (Reported in PEEL: Effectiveness 2015 (Vulnerability) report – previous report to your Sub Committee refers). Three quarters of forces did not meet the standard of Good in relation to care and support for vulnerable victims, including children.
- Big improvements in how forces respond to domestic abuse victims. (However, see recommendations previously reported in Increasingly Everyone's Business Inspection Report).

- Contribution of neighbourhood policing to overall police effectiveness striking.
- Risk that time neighbourhood teams can dedicate to their principal functions in communities is being eroded and corroded.

13. As well as these findings HMIC also identified some overarching themes:

- Forces need to increase the level and capability of specialist support to do the specialist and time-consuming work in areas such as digital evidence recovery and protecting vulnerable people.
- Forces need to be able to adapt to growing demands and develop their workforce plans accordingly.
- Findings that forces' ability to learn from what works, and evaluation of their own practices are limited.

14. Absence of systematic understanding, learning and sharing of evidence of what works (both within and between organisations) has adverse implications for police effectiveness both at national and local levels.

15. The national report contains 2 recommendations neither of which are the direct responsibility of Force officers to deliver. However, the Force will be required to action outcomes once implemented. Details are attached at Appendix A.

City of London Police report

16. The City of London Police received an overall judgement grading of **GOOD**.

17. The key force findings are summarised below:

- CoLP is good at keeping people safe and reducing crime.
- Has appropriate systems and ways of working in place to identify emerging trends and works well with partner organisations.
- Has dedicated specialist detective capability for dealing with serious or complex crime.
- Able to identify its prolific and priority offenders.
- Force is effective at identifying and managing sexual and dangerous offenders.
- Works successfully with voluntary and statutory bodies to minimise harm.
- Has good understanding of the threat and risk presented by serious and organised crime and has broadened the scope of threats it considers.
- Continues to have difficulty in implementing effective diversionary strategies and managing offenders (this links and cross references with an AFI for the MPS).
- Should address lack of awareness in relation to serious and organised crime among response and community officers.

- Should replicate local partnership arrangements which are effective in the management of volume crime and anti-social behaviour in the organised crime arena.
- Not yet adequately prepared to tackle child sexual exploitation (CSE), needs to obtain a comprehensive understanding of impact and consequences of this type of abuse in City.

18. Although HMIC has reported separately on the matters relating to CSE as part of its Effectiveness (vulnerability) report, it has been included within this report also as the 'umbrella' report for effectiveness.

19. The Force report contains 2 Areas for Improvement (with one cross referencing with an AFI given to the MPS). Details are attached at Appendix A.

Missing Children: who cares? The police response to missing and absent children (national report).

20. On 23rd March 2016 HMIC published its Missing children: who cares? report.

21. HMIC inspected the police response to missing and absent children as part of its summer 2015 PEEL Inspection processes particularly as part of the vulnerability strand. These inspections also included an assessment of forces' preparedness to tackle child sexual exploitation.

22. The PEEL: Police Effectiveness (Vulnerability) national and force reports were published on 14th December 2015 and reported to SMB in January 2016 and your Sub Committee in February 2016. This new thematic report provides the background to the findings published in the Effectiveness (Vulnerability) reports and focuses particularly on information available to HMIC about the outcomes of police contact with children who go missing from home or care, and the links to children at risk of sexual exploitation.

23. The City of London Police received a grading of REQUIRES IMPROVEMENT from the PEEL Effectiveness (Vulnerability) inspection. In terms of missing children the Force report stated that "The City of London Police is in a good state of preparedness to respond to children reported as missing." Also that "existing partnership arrangements are agile enough to provide support to families when incidents are reported, and officers within the Public Protection Unit have trained alongside subject matter experts in the Metropolitan Police Service in case they are required for investigations."

24. However, the report did note deficiencies around the Force's understanding of child sexual exploitation and other over-arching improvements in identification and risk assessment of vulnerability, which your Sub Committee will already be aware of.

25. Overarching themes within this report have already been reflected in recommendations made to forces in previous child protection and PEEL inspections around:

- Raising staff awareness of their responsibilities for protecting missing children, and especially those who go missing repeatedly;

- Improving risk assessment and the use of 'absent' and 'missing' categories;

- Raising staff awareness of the significance of drawing together all available information from police systems, including information about those who pose a risk to children, and using this better to inform risk assessments;

- Improving the police response to missing children and CSE to protect children at an earlier stage and improving recognition of the links between the two;

- Improving investigations and their supervision, and clarifying roles for officers involved; and

- Improving how forces identify, disrupt and prosecute perpetrators of CSE.

26. The report makes 10 recommendations (attached at Appendix A). 3 are for the Home Office to deliver, 3 for the NPCC, 3 for the College of Policing and 1 for Chief Constables. As this recommendation forms part of the overall vulnerability piece that is currently being delivered as part of the Effectiveness (Vulnerability) Action Plan, and governance of safeguarding issues being managed via the recently 'revamped' Safeguarding (CoLP internal) meeting it has been incorporated within the delivery of improvements already identified as part of the PEEL Effectiveness (Vulnerability) report.

The tri-service review of the Joint Emergency Services Interoperability Principles (JESIP) (national report)

27. On 12th April 2016 HMIC published its Tri-Service review of the Joint Emergency Services Interoperability Principles (JESIP).

28. The Joint Emergency Interoperability Programme was a national programme established in 2012 which in April 2015 evolved into a set of principles to be worked across the 3 emergency services (Police, Ambulance and Fire).

29. The following observations emerged from the review:

- All three services across the country recognise the importance of interoperability and consider that JESIP provides a welcome focus and structure to develop the associated skills.

- JESIP was driven top-down whereas if it is to become fully embedded then it needs to be part of the initial and continuation training and shared across the wider responder community such as the Maritime and Coast Guard Agency and Border Agency.

- Central guidance and direction remains necessary to provide the focus and drive to ensure JESIP remains a high priority.

- All three services have very different historical backgrounds, ethos and cultures. Improving interoperability has been and will remain a challenge. The introduction of METHANE (a mnemonic for passing information in an agreed and standard format) as a method of sharing situational awareness is a step forward but it needs to be used more frequently so that it becomes part of normal day to day business

30. Overall it is recorded that the review team considers that interoperability has yet to be fully embedded across the services visited. The overall assessment is that England is at Level 2 (4 being the highest level).

31. The report makes 6 recommendations. These in the main are overarching and not directly focused at a particular organisational body, to deliver. However, there are a number of recommendations (1, 2, 4 and 5 that the Force could directly address to ensure knowledge and preparedness are embedded within the Force. Members are requested to note that this report has not yet been considered by SMB, therefore no decision has yet been made regarding the extent to which these recommendations will be adopted in Force. Following that decision, they will be added to Appendix A.

HMIC Areas of Interest for 2016

32. HMIC has identified 5 areas of interest for 2016, which have been raised by HMIC in discussion with the Chairman and Deputy Chairman of Police Committee. The Force was requested by to provide an update to these areas to your Sub Committee. The areas and the updates appear immediately below.

How the force works with the Metropolitan Police Service to develop its response to managing offenders that live outside of its geographical boundaries;

33. Historically this has been challenging for the Force to progress as until recently, the MPS has not had a London-wide response to managing offenders, with individual boroughs having their own processes and systems. This difficulty was recognised by HMIC who therefore gave the MPS a specific AFI to develop this area and work with the City of London of Police to provide an effective and consistent London-wide response.

34. The MPS has developed a London-wide Integrated Offender Management Strategy Framework that is based on the key principles of effective management of offenders published by the Home Office. The Force is now using this framework, with details of the City's four priority prolific offenders

(PPOs) being entered onto the MPS's IDIOM system, which analyses and provides reports on patterns of offending with regard to PPOs.

35. The BTP (South East) were in the same position as the City of London Police but now have a relationship where they link up with the relevant MPS borough where a PPO resides. Internally the MPS manage ownership of a PPO via the borough in which the offender resides

36. The Commander (Ops) and Superintendent Administration of Justice are now progressing this for the Force, proposing to link more formally into the MPS's framework and be recognised as a partner.

How the initiative launched by the force in November 2015 to enable the use of mobile technology by frontline officers affects operational activity

37. Mobile Working has been one of the most complex and innovative changes for front line officers within the City of London Police in many years. It has grown from its initial concept of a device with a workflow app to a full desktop replacement with all the access and functionality that offers. In order to embrace new ways of working through other innovations it will continue to evolve and respond to those changes.

38. A report was submitted to the Force Change Board on 4th May 2016 outlining the next steps; the project is about to be formally closed so that the transition to business as usual can begin. There will be a team of 3 people who will be dedicated to making that happen. They will also ensure (and document) the full operational benefits are realised over the coming 1 to 2 years. Some of those operational benefits are outlined below.

39. Currently the system is using a platform known as 'PRONTO' that officers can use to record crimes and access other systems. However, until the mobile devices are fully compatible with the Force's replacement, Case, Custody and Crime Inputting system, their full potential will not be realised. In addition to the interface with CCCI, officers will be able to view fixed camera images and streaming video on devices (part of the Ring of Steel upgrade project); this will enable evidence to be viewed in real time supporting front line officers during operational activities, allowing officers to review incidents that are attending to identify people, risk assess and determine what other resources maybe required prior to arriving on the scene.

40. There are also potential benefits linking in to the Emergency Services Mobile Communications Programme (ESMCP) (effectively the replacement for 'Airwave' due to be operational in London by April 2019).It may be possible to attain early accreditation under ESMCP for the current Force devices to be transitioned to the Emergency Services Network. This provides time for the Force to ensure the next iteration of mobile devices is fully compatible with the national system.

The establishment of a future workforce plan that is aligned with the force's overall demand and budget

41. Although the Force was graded GOOD overall in last year's PEEL Efficiency inspection an area for further improvement was published that related to the development of a workforce plan, which is linked to demand and budget.

42. Whilst the Force has in place numerous governance arrangements that considers workforce numbers, the requirement for certain skills and future planning, there was no single document that consolidated and articulated that work.

43. The Force has now almost completed such a document. (It will be complete by the time that the HMIC re-inspect the Force in June 2016). In addition to providing details of the Force numbers overall, it considers the changing future demands faced by the Directorates to facilitate detailed planning of where skills gaps might exist so that plans can be put into effect as mitigation. It also links directly to the Force budget as required by HMIC's AFI.

Improved understanding of the reasons for the use of stop and search and Taser against some minority groups

44. Following the publication of the PEEL- Effectiveness report, where this was highlighted as an issue, the Force has taken a number of remedial actions. There have been numerous engagements with groups (including in schools and universities) of predominantly BME backgrounds, and ranging in age from 12 to 50+. The Force consulted with them regarding the Best Use of Stop and Search scheme and TASER use, with a view to the Force better understanding community perceptions around stop and search and TASER. The interactions have also provided the Force with a number of suggestions to improve Force practices and systems in these areas. These are being developed into an action plan, xwhich will be delivered via the Control Measures Group, chaired by the Superintendent Operations, Uniform Policing Directorate (UPD).

45. The Community Scrutiny Group, who assess stop and search and TASER data, has also been re-vamped and has now met twice since the report was published.

46. UPD is confident that there are reasonable grounds why stops and searches are conducted, however, they accept that on occasions those reasons have not been well expressed. They have put measures in place to ensure this improves, which in turn will assist the Control Measures Group (internal) and Community Scrutiny Group (external) to understand the use of stop and search and TASER against people from a BME background.

How the force meets the challenge of the fast-changing nature of economic crime

47. The Force's role as national lead force for fraud puts in a unique position when it comes to responding to the rapidly changing nature of economic crime.   The

following are examples of things the Force has done or are doing to ensure the City of London Police can continue to meet its obligations as national lead force for fraud and provide an effective response to the rapidly evolving world of economic crime.

i. New technology purchased for the national fraud and cyber reporting service provides police forces with real time access to fraud and cyber intelligence covering threats, offenders and victims. This enables forces to develop a more dynamic and intelligence-led approach to emerging threats.

ii. An innovative approach is essential to meeting this challenge. The Force recently successfully bid for funds from the innovation fund that will be applied to 4 new projects, which amongst other things will: improve the effectiveness and speed of digital evidence analysis; capture, harvest and share data of false identity data collected by scanners in banks; and a new national economic crime learning centre in partnership with academia.

iii. Bringing private sector expertise into policing – the flexible use of special constables that have a broad range of specialist knowledge has increased our technical cyber capabilities, business capabilities and increased our capacity to deal with economic and cyber crime. Similarly, the Force has a number of secondees from industry working with units providing cutting edge professional knowledge and experience.

iv. The Joint Fraud Taskforce launched in February by the Home Secretary is a partnership between the Home Office, the City of London Police, Financial Conduct Authority, National Crime Agency, Bank of England, Cifas and a number of banks. Collectively the taskforce will focus on a number of areas, however, the areas most relevant to rapidly changing threats include: understanding the threat, identification of intelligence gaps and vulnerabilities; collective fast track intelligence sharing; and tackling systematic vulnerabilities by removing weak links in systems and processes which fraudsters exploit.

v. As a founding partner of the Global Cyber alliance, the Force is now part of a global partnership that has been set up to tackle the increasing global threats posed by cyber attacks, share intelligence and use technical experts to engineer out identified cyber risks.

48. The above is in addition to the 'business as usual' work that the Force does regarding education and prevention (which 'target hardens' areas likely to be exploited by criminals); funded units working in specialist areas (such as insurance fraud and intellectual property) and disrupting the digital enablers of economic crime.

Contact:
Stuart Phoenix
Strategic Development - T: 020 7601 2213
E: Stuart.Phoenix@cityoflondon.pnn.police.uk