

HMICFRS Report Recommendations

Traffic Light Colour	Definition of target achievement
GREEN	The recommendation is implemented
AMBER	The recommendation is subject to ongoing work and monitoring but is anticipated will be implemented
RED	The recommendation is beyond designated deadline or cannot / will not be implemented (rationale required) or
WHITE	The recommendation is not CoLP responsibility to deliver or is dependent upon another organisation delivering a product.

PEEL: Police Legitimacy 2017 – National

A national report by HMICFRS

Published 12th December 2017

There are 2 recommendations which apply to the force and are to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p>Cause of concern HMICFRS is concerned that forces are not able to demonstrate that the use of stop and search powers is consistently reasonable and fair. In particular, there is over-representation of BAME people, and black people in particular, in stop and search data which many forces are unable to explain.</p> <p>Recommendation By July 2018, all police forces across England and Wales should be regularly and frequently monitoring a comprehensive set of data and information on use of stop and search powers to understand:</p>	AMBER	July 2018	This is a new report produced by HMICFRS published 12 th December 2017. Strategic development has drafted an action plan which is being discussed with the force lead for stop and search.

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> the reasons for any disproportionate representation of different ethnic groups in the use of stop and search; the extent to which find rates differ between people from different ethnicities, and across different types of searches (including separate identification of find rates for drug possession and supply-type offences); and the prevalence of possession-only drug searches, and the extent to which these align with local or force level priorities. <p>Where forces identify disparities through monitoring, they should demonstrate to the public that they have:</p> <ul style="list-style-type: none"> carried out research and analysis in an attempt to understand the reasons for the disparity, and taken action to reduce the disparity, where necessary; <p>We expect forces to publish this analysis and any actions taken at least on an annual basis, from July 2018.</p>			
2	<p>Recommendation</p> <p>By July 2018, and ongoing following that date, forces should ensure that all officers who use stop and search powers have been provided with, and understand, training on unconscious bias and College of Policing APP on stop and search.</p>	AMBER	July 2018	

PEEL: Police Legitimacy 2017 – CoLP

A national report by HMICFRS

Published 12th December 2017

There are 7 recommendations which apply to the force and are to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	The force should ensure that all relevant officers have received appropriate training on the use of stop and search powers.	AMBER	No deadline assigned by HMICFRS. To be set within the draft action plan.	This is a new report produced by HMICFRS published 12 th December 2017. Strategic development has drafted an action plan which is being discussed with force leads. Deadlines for completion have not been stipulated by HMICFRS and these will be assigned in the draft actions plan.
2	The force should maintain and monitor a comprehensive set of data to understand the impact of its use of stop and search powers.	AMBER		
3	The force should ensure that all relevant officers and supervisors understand what constitutes reasonable grounds for stop and search and how to record them.	AMBER		
4	The force should improve how it investigates allegations of discrimination and take action to ensure that all complainants and officers and staff subject to allegations of discrimination receive a good service from the force.	AMBER		

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	The force should improve the quality and timeliness of updates to complainants and witnesses during investigations in line with IPCC statutory guidance.	AMBER		
6	The force should improve its ability to monitor and improve the fairness and effectiveness of its process for managing individual performance and development and communicate this to the workforce.	AMBER		
7	The force should improve its understanding of its workforce's wellbeing and use this to prioritise the services it provides.	AMBER		

Planes, drones and helicopters: An independent study of police air support

A national report by HMICFRS

Published November 2017

There are 19 recommendations; 1 of which apply to force, these are to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	As soon as practicable, the National Strategic Board should reinvigorate the development of NPAS performance reporting, including the balanced scorecard, to better demonstrate the contribution made by NPAS to force effectiveness and efficiency. NPAS should publish its performance information at national and force levels and include regional levels only when	WHITE	No deadline set by HMICFRS	This action is for the National Strategic Board

Recommendations & Areas for Improvement		Status	Due Date	Comment
	this adds clear value.			
2	Before submitting its proposed costed fleet replacement plan to the Home Office, the National Strategic Board should ensure that all forces and local policing bodies are adequately consulted on the plan's operational and financial implications.	WHITE	No deadline set by HMICFRS	This action is for the Home Office and the National Strategic Board
3	By March 2018, the NPCC lead for air support should publish an interim operational strategy for all currently available forms of air support including drones, and publish a plan to improve communication on police air support between frontline officers, police managers, NPAS, chief officers and the College of Policing.	WHITE	March 2018	This action is for the NPCC lead for air support
4	By July 2018, the Chief Constables' Council should establish a high-level outline of the operational outcomes that air support (in all its forms) should facilitate. This should inform the development, by March 2019, of a new air support strategy by the NPCC lead for air support in conjunction with local policing bodies and NPAS.	WHITE	July 2018	This action is for the Chief Constables Council.
5	There should continue to be separation between strategic leadership on police air support and the day-to-day management of NPAS. Both require contributions from chief constables and local policing bodies, according to their statutory responsibilities. But at least in the short term, the roles of the chief officer leading NPCC policy development and the chief constable responsible for the operation of NPAS should continue to be filled by different individuals.	WHITE	No deadline set by HMICFRS	This action for NPAS Strategic Board and the NPAS Management Board

Recommendations & Areas for Improvement		Status	Due Date	Comment
6	To enhance confidence in the ability of the National Strategic Board to set strategic direction and to oversee performance management, as soon as practicable, a local policing body member of the board other than the lead local policing body should be appointed as chair of the board.	WHITE	No deadline set by HMICFRS	This action is for the National Strategic Board
7	As soon as practicable, the collaboration agreement should be amended to permit a British Transport Police chief officer and a representative of the British Transport Police Authority to join the National Strategic Board as voting members. The National Strategic Board should also invite a British Transport Police officer to participate in the Independent Assurance Group.	WHITE	No deadline set by HMICFRS	This action is for the National Strategic Board
8	Following analysis of force use of air support tactics and after receipt of subject matter expert advice through relevant NPCC portfolio leads, the College of Policing should update all references to air support in existing Authorised Professional Practice. The College should also update other APP modules identified after consultation with the NPCC lead for air support and NPAS, such as those concerning investigation and missing persons.	WHITE	No deadline set by HMICFRS	This action is the College of Policing
9	By July 2018, the NPCC lead for air support should oversee data collection and analysis in a limited number of forces (taking account of use of air support in proportion to population figures and any other readily available data), with a view to uncovering the reasons for differences in the use of air support tactics. Chief constables should use the results from this exercise to review their use of air support.	WHITE	July 2018	This action is for the NPCC lead for air support
10	The NPCC lead for air support should work with other relevant NPCC portfolio leads and NPAS to produce, by December 2018, a comprehensive assessment of latent and patent demand for air support. This assessment should take account of the	WHITE	December 2018	This action is for the NPCC lead for air support

Recommendations & Areas for Improvement		Status	Due Date	Comment
	development of force management statements and be repeated from time to time to inform decisions on the composition and deployment of the police aircraft fleet.			
11	With immediate effect, the NPAS chief operating officer should review the impact of shift changes and consider staggering shift changeover times at NPAS bases, involving and informing forces throughout.	WHITE	Immediate	This action is for the NPAS chief operating officer
12	By July 2018, the NPCC lead for air support should carry out and publish a review of the NPAS deployment process, including forces' compliance with guidance on the use of air support and the timeliness of NPAS decision making.	WHITE	July 2018	This action is for the NPCC lead for air support
13	By March 2018, NPAS should communicate to forces its plans for the use of fixed-wing aircraft. After a suitable period, there should be a review of their effectiveness and efficiency; adequate steps should be taken to correct any shortcomings revealed in the review.	WHITE	March 2018	This action is for the NPAS
14	By March 2018, the National Strategic Board should facilitate the reaching of agreement between NPAS, the police counter-terrorism network and the Metropolitan Police Service on how security, counter-terrorism and armed policing deployments will be differentiated, to facilitate appropriate sharing of the full costs of NPAS services.	WHITE	March 2018	This action is for the National Strategic Board
15	From 2018/19 onwards, for financial purposes the National Strategic Board should treat the police counter-terrorism network as though it were a police force, and should recover all relevant revenue and capital costs for support provided to that network. The cost of counter-terrorism tasks undertaken in support of force-commanded operations, however, should	WHITE	April 2018	This action is National Strategic Board

Recommendations & Areas for Improvement		Status	Due Date	Comment
	normally be met by forces.			
16	Chief officers and local policing bodies should urgently consider options for revising or replacing the existing NPAS collaboration agreement, if necessary commissioning scoping work through the NPCC Specialist Capabilities Programme before agreeing how to proceed. Regardless of the form in which the collaboration is to exist in future, the intention should be to take account of the building-block pieces of work we have recommended and to have improved arrangements in place within no more than three years.	AMBER	No deadline set by HMICFRS	The Force is part of the national Section 22 agreement as this was required by ministerial order at the outset of the nationalisation of air support in policing terms. However, the Force uses the MPS assets (who are not part of the national collaboration) in any case and these are deployed as part of joint and pan London responses required for example for planned protest and high profile events in the City. There is limited scope to use air support in the prevention and detection of crime owing to the City scape. (e.g Heat seeking or infrared would be of limited use in this environment). The Head of I & I is responsible for ensuring that the arrangement with the MPS is formalised appropriately.
17	As soon as practicable, the NPCC lead for air support should commission an evaluation of the cost-effectiveness of police use of miniature and small drones, drawing on advice from the College of Policing and working with any other partners considered appropriate. This evaluation should produce an evidence base to inform subsequent guidance and decision making.	WHITE	No deadline set by HMICFRS	This action is for the NPCC lead for air support
18	By December 2018, the NPCC lead for air support should design a methodology that can be used at force, regional and national levels to assess the benefits and risks of collaboration on air support with other emergency services and public bodies such as Border Force and Immigration Enforcement, including collaboration on the use of drones.	WHITE	December 2018	This action is for the NPCC lead for air support

Recommendations & Areas for Improvement		Status	Due Date	Comment
19	The NPCC Specialist Capabilities Programme should co-ordinate activity so that, by March 2019, chief constables for all 44 forces contributing to NPAS are able to publish in a consistent format a detailed description of the air support each force requires.	WHITE	March 2019	This action is for the NPCC Specialist Capabilities Programme

HMICFRS Value for money profile – City of London police

A Force report by HMICFRS
Published November 2017

Findings from this report, which has no recommendations, are the subject of a committee paper to Performance sub 1st February 2018.

A progress report on the police response to domestic abuse

A national report by HMICFRS
Published November 2017

There are 9 recommendations, 1 is national and 8 apply to force of which 7 are complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Areas for improvement Risk assessment – Although HMICFRS found that in general risk assessment is improving, forces still use a range of different and inconsistent practices when assessing risk, which potentially means that victims might receive different levels of service across England and Wales. HMICFRS has also raised concerns about the practice of conducting the initial risk assessment over the telephone. HMICFRS has been clear that	NEW GREEN	January 2018	The DASH is the only risk assessment tool used by the force for initial assessment. The public protection unit build upon this initial DASH assessment utilising more in depth assessment tools for stalking [S-DASH] and Honor Based Abuse [Karma Nirvana].

Recommendations & Areas for Improvement		Status	Due Date	Comment
	forces should continue to use the Domestic Abuse, Stalking, Harassment and Honour-Based Violence risk identification, assessment and management model (DASH) until the College of Policing has completed its pilot on a national risk-assessment model for frontline officers.			
2	<p>Areas for improvement</p> <p>Positive action and the role of arrest – Despite very clear guidance in Authorised Professional Practice, there appears to be confusion about what positive action involves. Police officers have a duty to take positive action when dealing with domestic abuse incidents. Often this means making an arrest, provided that the grounds exist, and it is a necessary and proportionate response. The use of arrest is falling at an alarming rate, which can be explained in part by the misguided belief of some officers that their actions in not arresting the perpetrator are ‘victim-focused’. Officers need clear supervision and direction to ensure that all opportunities for an early arrest are taken. This is particularly true in relation to perpetrators of domestic abuse. It is crucial that such an approach is part of an effective process to protect victims and ensure their continuing safety.</p>	NEW GREEN	January 2018	<p>The force has a Domestic Abuse standing operating procedure which outlines positive the arrest policy and the RARA principles [Remove the risk - Avoid the risk - Reduce the risk - Accept the risk]. All Domestic reports are allocated to the Public Protection Unit for oversight and investigation. These are reviewed by the Detective Sergeants and this includes an assessment in relation to action taken against suspects. Any missed opportunity would be identified at this stage.</p> <p>Additionally Domestic Abuse cases are dip sampled on a quarterly basis where there is the opportunity to identify missed opportunities and identify general issues and themes.</p> <p>The Office for National Statistics domestic abuse in England and Wales data tool states that for every 100 Domestic abuse crimes there are 68 arrests for the 12 months to 30th June 2017 – the highest is Cumbria with 69.</p> <p>The arrest rate forms part of the forces Domestic Abuse monthly Performance Dashboard. This dashboard is reviewed at the Crime Directorate monthly performance meeting, the Vulnerability working group and Vulnerability steering group for oversight.</p>
3	<p>Areas for improvement</p> <p>Build the case for the victim – HMICFRS accepts that domestic abuse victims are often reluctant to support a prosecution, given the financial, housing and family connections they might have with the perpetrator, or the level of control which they</p>	NEW GREEN	February 2017	<p>The City of London Police does pursue domestic abuse cases without the victim’s support, a recent example of which dates from December 2017.</p> <p>Throughout the life of investigations reviews are undertaken by</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>may be under. Despite this, there are opportunities for investigators to build a sound case against the perpetrator whether the victim supports a prosecution or not. It is important that police officers are clear about what constitutes an acceptable level of investigation in all cases of domestic abuse. Given the high and increasing number of cases that are closed due to 'evidential difficulties – victim does not support police action', it is vital that clear standards and expectations are set for building the best possible case for the victim (including working with specialist domestic abuse services), which increase the likelihood of a victim working with the criminal justice process and giving evidence at a trial.</p>			<p>supervisors and consideration is given to prosecution without the victims support.</p> <p>Every domestic abuse crime is reviewed at the point of closure by a Public Protection Unit sergeant utilising a closure template. One of these considerations is whether prosecution without the victims support is appropriate.</p> <p>The Domestic Abuse SOP refers to building a case that does not rely solely on victim evidence, covering the following areas:</p> <ul style="list-style-type: none"> - Body Worn Video - Record scene - Injury photos - Demeanours - Witness statements - CCTV/House to House enquiries <p>As part of continual improvement , monitoring of 'the victim does not support prosecution will be added to the Domestic Abuse dashboard which will enable review at Crime Directorate SMT, Vulnerability Working Group and Vulnerability Steering Group.</p>
4	<p>Areas for improvement</p> <p>A shared view with the Crown Prosecution Service (CPS) on referrals and prosecutions – There is wide variation in the number of cases which police forces refer to the CPS. Referrals are declining and charge rates are falling year on year. Police forces and the CPS have been examining this matter in an attempt to understand the variation and reduction in the rate</p>	NEW GREEN	January 2018	<p>Domestic abuse cases are investigated by the Public Protection Unit who have access to domestic abuse specialists within the CPS and there are specific pathways if the case involves rape. The Office for National Statistics domestic abuse in England and Wales data tool states that for every 100 Domestic abuse crimes there are 68 arrests for the 12</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	of referrals. During the period of this report, the CPS has also invested in training to ensure that its staff are building the case for the victim, even when the victim does not want to make a complaint. However, this cannot be done if the case is not presented to the CPS. To reverse the current trend, forces need to work closely with the CPS to understand when cases should be referred.			months to 30 th June 2017 – the highest is Cumbria with 69. There is currently no evidence to suggest this issues applies to the force.
5	Areas for improvement The elements of a thorough police response – The overall response to domestic abuse has improved over the last three years, but the service provided for domestic abuse victims is not consistent across all 43 forces. Early and accurate identification of risk, followed by timely deployment, frontline officers who understand the dynamics of domestic abuse, early arrest and effective evidence-gathering at the scene are highly likely to provide the best chance of securing a conviction. Where a charge is not appropriate, forces need to consider the use of powers such as DVPNs/DVPOs and referrals to appropriate specialist domestic abuse organisations to protect and safeguard the victim. The investigation of the perpetrator, and continuing support for the victim (e.g. consistent and timely information and communication about the progress of the case) are equally critical. Some forces are better than others at each part of the response to domestic abuse. From the first point of contact, the police service needs to ensure that it understands each element of its response to domestic abuse to help ensure that its response is effective.	Evidence against this area of Improvement has been sub divided for clarity		
		NEW GREEN	January 2018	<u>Identification of risk / deployment / evidence gathering</u> Domestic abuse training has been provided throughout 2017; 112 Officers trained. The force uses the DASH risk assessment as its initial assessment tool. Deployments are monitored by the Performance Events Team with the force control room. In addition to training the force provides guidance with the domestic abuse SOP with regard to gathering evidence and not solely relying on victim evidence.
		NEW GREEN	January 2018	<u>DVPNs/DVPOs and referrals to appropriate specialist domestic abuse organisations to protect and safeguard the victim</u> Domestic violence protection notices and domestic protection orders are considered on every domestic abuse incident by Officers of the public protection unit and are considered again at the point of closing the case. Theses protection orders are monitored on the domestic abuse dashboard. Public protection officers have had sufficient and recent [2017] training in this area. A table top DVPO training exercise for Supts was rolled out in 2016 and will be revisited following postings moves in January 2018.

Recommendations & Areas for Improvement		Status	Due Date	Comment
		NEW GREEN	January 2018	<p><u>Continuing support for the victim</u></p> <p>The force has a Vulnerable Victim Coordinator [VVC], provided by Victim Support and embedded within the Public Protection Unit. The VVC provides immediate crisis support for victims of domestic abuse and is a conduit for referral to specialist agencies in relation to victim's particular needs. The City of London also have embedded relationships with Domestic Abuse partners which the force can access. Additional support to victims is provided via the force's Administration of Justice Unit [Witness care] as cases proceed to court. Public protection officers and the VVC maintain contact through this period to provide continuity and facilitate visits to the court ahead of the trial. Officers and investigations within the Public Protection Unit are monitored to ensure the victim has received regular updates on progress.</p>
6	<p>Areas for improvement</p> <p>Consistent performance measures – In our last domestic abuse thematic report Increasingly everyone's business, HMICFRS highlighted that some forces had still not completed comprehensive analysis to understand domestic abuse within their area. Throughout this inspection, we have worked with forces to analyse their data, and found that many forces still struggle to record and accurately reflect their performance through the data they collect. They are still unable to explain what is happening in terms of arrest and outcome data even where this is particularly high or low. This suggests that these forces are not monitoring their data for insight into what is changing (or not) in the policing of domestic abuse. Given the importance of the police response to domestic abuse, it is disappointing to see that forces still do not record their performance relating to domestic abuse in a consistent way. Force leaders should use force data more effectively in order</p>	NEW GREEN	January 2018	<p>The COLP has a Domestic Abuse performance dashboard which is updated on a monthly basis. The dashboard includes relevant data such as number of crimes/incidents, arrest rate, MARACs, Domestic violence disclosure scheme requests, domestic violence notice and orders and outcome/demographic data.</p> <p>This dashboard is reviewed at the Crime directorate SMT meeting, Vulnerability working and Vulnerability steering group.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	to understand demand and monitor performance.			
8	Recommendation: National domestic abuse data monitoring <ul style="list-style-type: none"> The Office for National Statistics (ONS) published in 2016 a new statistical bulletin and data tool in relation to domestic abuse, bringing together certain data on domestic abuse at a force level. This has started to enable police and crime commissioners, chief police officers, crown prosecutors and other agencies within the criminal justice system to enhance their understanding of how domestic abuse is dealt with in their local areas, and improve the monitoring of performance and setting of priorities. The Home Office, the Ministry of Justice, the Crown Prosecution Service, the National Police Chiefs' Council (NPCC), the Association of Police and Crime Commissioners (APCC), the College of Policing, HMICFRS and domestic abuse organisations should continue to work with the Office of National Statistics to expand this data set to enable a more thorough analysis of how domestic abuse is dealt with in a force area. 	NEW GREEN	February 2018	<p>The Office for National Statistics bulletin and data tool is known to the force, but is of very limited value to the City because of the low volumes of incident reports and the tool utilising resident population figures.</p> <p>The Public Protection Unit has recognised these shortcomings and developed a domestic abuse dashboard which is reviewed at directorate, working group and steering group levels.</p>
		NEW GREEN	February 2018	The force will continue work with all appropriate organisations.
9	Recommendation: Update of forces' domestic abuse action plans Update of forces' domestic abuse action plans By April 2018, every police force in England and Wales should	Evidence against this area of Improvement has been sub divided for clarity.		

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>update its domestic abuse action plan, determine what more it can do to address the areas for further improvement highlighted in this report and specified below, and publish its revised action plan accordingly.</p> <ul style="list-style-type: none"> • Recording. There is considerable variation between forces in the proportion of recorded crime identified as relating to domestic abuse. Forces need to ensure that domestic abuse crime including coercive control is being correctly identified and recorded. • Assessing and responding to risk. Forces should ensure arrangements for assessing and managing risk are well understood by officers and staff, especially at initial point of contact, and decision making about the grading of, and attendance at, domestic abuse incidents is supervised effectively. • Positive and preventative action. Nationally, arrest rates for domestic abuse are falling, with large variations across forces. There are considerable variations in the use of preventative measures. Forces need monitoring processes, supported by accurate data, to ensure that they are taking positive action such as arrest, and are making effective use of powers, for example Domestic Violence Protection Orders and the Domestic Violence Disclosure Scheme. Where orders or bail conditions are breached, forces need to ensure that there are appropriately robust processes in place to take action. • Building the investigative case. Forces need to ensure that there are clear standards and expectations, with effective supervision, for building the best possible case for the victims of domestic abuse whether victims support police action or 	NEW GREEN	April 2018	<p><u>Domestic Abuse Action Plan</u></p> <p>The domestic abuse action plan for the City of London Police 2017/2018 has already been updated and published. Annual production of this document is an embedded process within the Public Protection Unit having been published in previous years commencing 2015/2016.</p>
	AMBER	April 2018	<p><u>Recording</u></p> <p>To ensure the correct recording of domestic abuse crime [including coercive control] audits are undertaken to identify issues. As at October 2017 domestic abuse crimes are being recorded correctly in 86% of a cases.</p> <p>This audit report made 2 recommendations to further improve the accuracy of recording.</p> <p>Action required: Audit report recommendations to be implemented and retested to ensure compliance.</p>
	AMBER	April 2018	<p><u>Assessing and responding to risk</u></p> <p>Domestic abuse training is mandatory for frontline staff and this is a rolling programme training. It is also offered to all staff in force. This training covers risk assessment and management.</p> <p>The force is currently considering mandatory training of its Economic Crime officers [Vulnerability Steering Group 10th January 2018] since enquires frequently take officers into the homes of suspects.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>not.</p> <ul style="list-style-type: none"> • CPS referrals and prosecutions. Nationally, referrals and charge rates are falling. Forces need to monitor the data and work closely with the CPS to understand whether improvement is required, and, if so, to effect change. <p>Chief officers in each police force should continue to oversee and ensure full implementation of these action plans and offer regular feedback on progress to their police and crime commissioners. This should be a personal responsibility of the chief constable in each case. The leadership task for the service now is to sustain the level of determination and commitment seen since the publication of Everyone's business to ensure that the police response to victims of domestic abuse continues to improve. HMICFRS will continue to monitor progress against force action plans as part of their PEEL inspection regime.</p>	NEW GREEN	April 2018	<p><u>Positive and preventative action</u></p> <p>The domestic abuse dashboard is reviewed at the Vulnerability Steering which is chaired by the Commander Operations – any performance drops will visible and enable corrective action. The force has regular and senior level contact with the CPS which enables issues to be raised and resolved.</p>

PEEL: Police Efficiency – National

There is 1 recommendation and this applies to the force and 1 advisory note which the force has chosen to act on these are being progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p>Recommendation</p> <p>By September 2018, chief constables should produce an ambitious plan to improve digitally-enabled services within their force. The Home Office, National Police Chiefs' Council and Association of Police and Crime Commissioners should support the development of these plans by establishing a national framework which allows for the provision of digitally-enabled services across force boundaries</p>	AMBER	September 2018	<p>The force Senior Management Board considered this recommendation on the 19th December 2017 and assigned the Directorate Head of Economic Crime as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.</p> <p>The Directorate Head of Economic Crime already chairs the force Digital Policing Board.</p>
2	<p>The fore has chosen to act on an advisory note within the national report.</p> <p>HMICFRS have noted that forces still need to do more to improve their understanding of and explicitly link future demand and the skills and capability they need to manage it. Forces should consider plans to assess the likely skills and capabilities they will need to recruit, retain, and/or develop over the next 5 years and show how they plan to do so. HMICFRS will be looking for forces to demonstrate this within their workforce plans and this will be a significant element of the 2018/19 and future PEEL inspections.</p>	AMBER	Deadline to be set within draft action plan	<p>The force Strategic Management Board considered this recommendation on the 19th December 2017 and assigned the Director of Human Resources as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.</p>

PEEL: Police Efficiency [including leadership] 2017 - COLP

There are 4 recommendations which apply to force, these are to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Areas for improvement The force should put in place better processes and governance to understand and realise the benefits of change programmes, and how they affect the force's ability to meet likely future demand efficiently.	AMBER	No deadline set by HMICFRS to be addressed in the draft action plan	The force Strategic Management Board considered this recommendation on the 19 th December 2017 and assigned the Head of Change Portfolio Office as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.
2	Areas for improvement The force should undertake appropriate activities to fully understand its workforce's capabilities, in order to identify any gaps and put plans in place to address them. This will enable the force to be confident in its ability to be efficient in meeting current and likely future demand.	AMBER		The force Senior Management Board considered this recommendation on the 19 th December 2017 and assigned the Director of Human Resources as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.
3	Areas for improvement The force should ensure that it understands the level of service that can be provided at different levels of costs, so it can identify the optimum level of service provision.	AMBER		The force Senior Management Board considered this recommendation on the 19 th December 2017 and assigned the Director of Finance as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.
4	Areas for improvement The force should do more to explore opportunities for further collaboration with partner organisations to improve services, drive efficiencies and better manage demand for its services in the future.	AMBER		The force Senior Management Board considered this recommendation on the 19 th December 2017 and assigned the Commander Operations as action plan owner. Strategic Development will work with them to determine necessary actions, action owners and deadlines for completion.

Stolen freedom: the policing response to modern slavery and human trafficking

Published October 2017

There are 11 recommendations; 7 of which apply to force, 2 are completed and 5 to be progressed

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	Recommendation Within twelve months, forces should review their leadership and governance arrangements for modern slavery and human trafficking, to ensure that: <ul style="list-style-type: none"> • senior leaders prioritise the response to modern slavery and human trafficking; • every incident of modern slavery identified to police is allocated appropriate resources with the skills, experience and capacity to investigate it effectively; • forces develop effective partnership arrangements to co-ordinate activity in order to share information and safeguard victims; and • Performance and quality assurance measures are in place to allow senior leaders to assess the nature and quality of the service provided to victims. 	AMBER	The force SPOC for Modern Slavery and Human Trafficking has received the report and reviewed a draft action plan produced by Strategic Development which will now be incorporated into an existing 4P plan. Evidence against the recommendations is shown below, together with next steps.	
			October 2018	Any incidents are raised at the daily Management Meeting, the force has a standing operating procedure which details specific roles allocated to specialist officers when dealing with victims and offenders The force is represented at the Modern Slavery and Human Trafficking practitioners meeting which is attended by partners and agencies. All incidents or intelligence is drawn to the attention of the force lead, their deputy and the FIB analyst for review. <u>Next Steps</u> A vulnerability dashboard is to be developed which incorporate monitoring data on modern slavery and human trafficking
4	Recommendation Within six months, forces should have in place active information-sharing agreements with other agencies to facilitate speedy exchange of intelligence and in order to safeguard victims better and to identify suspects as early as	AMBER	April 2018	At the current time the force engages with modern slavery and human trafficking partners and agencies on a monthly basis. <u>Next steps</u> A baseline exercise is to be conducted to establish what information

Recommendations & Areas for Improvement		Status	Due Date	Comment
	possible.			sharing agreements, if any, are already in place this will enable gaps to be identified – the force will seek to put in place formal information sharing agreements to bridge these gaps.
5	Recommendation Immediately, forces should ensure that all victims carrying out criminal acts under compulsion attributable to slavery or exploitation are afforded the protection of early and continuing consideration of the applicability of the section 45 defence.	AMBER	Immediate	The standing operating procedure [SOP] deals specifically with offenders who may also be victims in these circumstances. There is also a specific section on the force intranet which offers guidance, advice and external contact details for officer use. <u>Next Steps</u> The SOP is now due for review by the SOP owner which presents an opportunity to enhance, if necessary, processes for officers to follow. The force crime, intelligence and custody system is to be reviewed to establish if section 45 defences can be flagged and highlighted for supervisory review.
6	Recommendation Immediately, forces should take steps to ensure they are fully compliant with the NRM process as it evolves and are implementing the requirement placed upon them under the Modern Slavery Act 2015 to notify the Home Office of any individual suspected to be an adult victim of modern slavery or human trafficking.	AMBER	Immediate	This process is described in the force standard operating procedure and the 'vulnerability' intranet webpage offers further advice for officers. 2017 has seen an increase in NRM referrals 6 from 2 in 2016. <u>Next steps</u> The training package will be reviewed. Arrangements are to be put in place to monitor NRM referrals at the vulnerability working group.

Recommendations & Areas for Improvement		Status	Due Date	Comment
7	Recommendation Immediately, forces should take steps to ensure they: <ul style="list-style-type: none"> fully comply with national crime recording standard (NCRS) requirements for offences identified as modern slavery and human trafficking and that sufficient audit capacity is available to the force crime registrar to provide reassurance that each force is identifying and managing any gaps in its crime-recording accuracy for these types of offences. 	AMBER	Immediate	A process is in place to ensure compliance with NCRS. Action required: Appropriate audit are to be included in the 2018/2019 schedule
8	Recommendation Immediately, forces should ensure that allegations or indications of modern slavery and human trafficking are thoroughly investigated and effectively supervised by teams and individuals with the skills and experience to undertake them (this should include the use where appropriate of joint intelligence teams and other means to obtain intelligence and evidence from agencies overseas).	NEW GREEN	Immediate	The forces standing operating procedure specifies specialist officers for dealing with victims and the investigation with all instances subject to review. The force is represented at the monthly practitioners meeting, chaired by the MPS other members include the National Crime Agency, Gang masters and labour abuse authority and other agencies. This engagement has enabled the force to maintain an awareness of current national themes/ trends. The force has acted on this awareness and has commenced engagement with the construction industry operating sites within the city.
9	Recommendation Immediately, forces should review their use of preventative powers under the Modern Slavery Act 2015 to ensure that opportunities to restrict the activities of those deemed to pose a clear threat to others in respect of modern slavery and human trafficking offences are exploited.	NEW GREEN	Immediate	The preventative powers referred to in this recommendation are civil orders: slavery and trafficking prevention orders and slavery and trafficking risk orders. These orders are considered on a case by case by and reviewed with the Major Crime team by a Detective Inspector.

Making it fair - A joint inspection of the disclosure of unused material in volume crown court cases

A joint national report by HMCPsi and HMICFRS
Published July 2017

There are 9 recommendations; 5 of which apply to force, 1 is complete and 4 to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Immediately, police and CPS must correctly identify all disclosure issues relating to unused material at the charging stage and this must be reflected fully in an action plan	RED	HMICFRS: January 2018 New deadlines will be assigned upon receipt of the joint action plan	Meetings with the CPS have taken place [21 st and 23th November] to discuss the recommendations. AoJ have commented on a draft action plan produced by the CPS which they will incorporate in a revised joint action plan. The revised joint action plan will be circulated by the CPS to the London Criminal Justice Board, NPCC leads and Chief Crown Court Prosecutors for review and approval and is expected to be launched January 2018. There are 5 recommendations for the force to be covered by the joint action plan, but the force has already taken action to nominate a 'Disclosure Champion' [Head of AoJ] so 4 recommendations are to be progressed.
4	Within six months police forces should improve their supervision of case files, with regard to the handling of unused material. This process should be supported by the requirement for supervisors to sign the Disclosure Officer's Report each time this is completed	RED	HMICFRS: January 2018 New deadlines will be assigned upon receipt of the joint	HMICFRS set deadlines of January 2018 against these recommendations, since the joint action plan is not going to be published until that time, the force will need to set new deadlines. The joint action plan has not been received in force at this time.

Recommendations & Areas for Improvement		Status	Due Date	Comment
			action plan	
8	Within 12 months, the police and the CPS should review their respective digital case management systems to ensure all digital unused material provided by the police to the CPS is stored within one central location on the CPS system and one disclosure recording document is available to prosecutors in the same location	AMBER	July 2018	
9	Within six months, the CPS and police should develop effective communication processes that enable officers in charge of investigations and the allocated prosecutor to resolve unused material disclosure issues in a timely and effective manner	AMBER	HMICFRS: January 2018 New deadlines will be assigned upon receipt of the joint action plan	

Living in fear - the police and CPS response to harassment and stalking

A joint national report by HMCPSi and HMIC

Published July 2017

There are 22 recommendations; 4 of which apply to force.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	Chief constables should stop the use of Police Information Notices and their equivalents immediately.	WHITE	Immediate	Action Required: The national lead is to be contacted to establish if there is a view on HMIC’s recommendation for Chief Constables to stop using Police Information Notices and their equivalents.
9	Chief constables should ensure that officers are aware of, and use appropriately, the powers of entry and search for stalking. Chief constables should also ensure that adequate records of these searches are compiled for audit and compliance purposes.	WHITE	No deadline set by HMICFRS - force to determine its own deadlines pending NPCC decision	Current Position: NPCC lead for Stalking & Harassment ACC Garry Shewan advised he will be writing to all Chief Constables to set out the timetable and proposals for interim actions from the Inspection and that there will be a joint CPS & Police action plan which will be issued from the NPCC lead– these are still pending Head of PPU continues to chase. In addition forces will also be given some direction on Recommendation 8 where the HMIC are requesting all forces to remove the use of police information notices. In the meantime, the NPCC lead is supporting current guidance on the use of PINS. Nationally there is the possibility of adopting ‘Early Harassment Notices’ but not for stalking. The College of Policing has consulted forces on an alternative to PINS. Status is held at WHITE until the receipt of the joint action plan above from the national lead.
10	Chief constables should work with criminal justice partners to identify what programmes are available to manage offenders convicted of harassment and stalking offences in their respective force areas. In the absence of such programmes, they should review whether interventions could and should be established.	WHITE		
11	Chief constables and CPS Area leads should monitor and ensure compliance with the national stalking protocol.	WHITE		

PEEL: Police Effectiveness 2016

A Force report by HMIC

Published March 2017

There are a total of 13 actions for the force. 11 are complete and 2 in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
10	<p>Areas for improvement</p> <p>The force should improve its understanding, across the government's national 4P framework, of the impact of its activity against serious and organised crime, and ensure that it learns from experience to maximise the force's disruptive effect on this activity</p>	NEW RED	<p>Sept 17 [internal deadline]</p> <p>Now due: January 2018 and June 2018</p>	<p>The role of lead responsible officer [LRO] has been raised to a minimum level of Inspector rank to take responsibility for serious and organised crime intelligence and organised crime mapping. The role and responsibilities of LROs have been documented.</p> <p>By January 2018 the following is due for completion:</p> <ul style="list-style-type: none"> Newly appointed LROs are nominating leads for the PREVENT, PROTECT and PURSUE elements of their management plans. Management plans to be reviewed by Directorate Serious and Organised crime leads for compliance. LROs to review their management plans to maximise the impact of using partner agencies / third sector organisations where expedient to do so. LROs to review their management plans to secure cross-Directorate resources using the tactical tasking and co-ordination process (TTCG).

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>These actions will be reviewed at Directorate level Serious and Organised crime meetings scheduled for each Directorate during February 2017.</p> <p>The Fraud Academy will develop a LRO training programme which will include continual professional development, this will be completed by June 2018.</p>
12	<p>Areas for improvement</p> <p>The force should improve its understanding of the impact of its activity on serious and organised crime and ensure that it learns from experience to maximise the force's disruptive effect on this activity.</p>	AMBER	<p>Sept 17 [internal deadline]</p> <p>Now due: March 2018</p>	<p>The roles and responsibilities of Lead Responsible Officer have been reviewed and redefined. These roles are now held at a minimum level of Inspector rank.</p> <p>Debrief reports are produced and held centrally on a database, these reports include specific recommendations, progress against which are tracked on the database.</p> <p>Analysis to understand which tactics are having best affect has commenced and will be embedded by March 2018.</p>

Best Use of Stop and Search Scheme revisit 2016

A Force report by HMIC
Published February 2017

HMIC reported that following a revisit in November 2016 they found that the force was compliant with the Best Use of Stop and Search scheme having previously failed on 2 requirements.

HMIC further advised that the force's monitoring and analysis could be further enhanced and these suggestions have been accepted and are reported below.

Total of 3 actions: relevant to the City of London Police and in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
Areas for Enhancement Enhance monitoring data on:				
1	the reason for searches (e.g. drugs) by ethnicity and age	NEW RED	April 2017 [internal deadline] Now Due: January 2018	The force has accepted HMICs suggested enhancements but has determined there were issues with existing systems in producing this information. The introduction of Niche [25 th October 2017] is expected to improve this situation and is being re-examined with a view to establishing a capability by January 2018. A specialised has been tasked to create the required business objects reports and these are awaited having missed their original due date. New delivery dates are required and being chased.
2	the rate at which the item searched for is found, by ethnicity and age	NEW RED		
3	Individual officer/team data – totals, outcomes and find rate, by ethnicity and age.	NEW RED		

PEEL: Police Legitimacy 2016 – National

A National report by HMIC

Published December 2016

Total of 3 actions are relevant to the City of London Police, 2 are complete and 1 is in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Cause of concern HMIC is concerned that some forces are failing to comply with current national vetting policy. This means that these forces are employing individuals who have not undergone even basic vetting checks, which represents a significant risk to the integrity of the organisation.	GREEN	June 2017	<u>Within 6 months</u> The Head of Professional Standards confirms that current national vetting standards are being compiled with. New national guidelines were expected in 2017 but their publication has been delayed with no new timescales announced. The Professional Standards Control Strategy has been produced and vetting is fully referenced in it.
	Recommendation To address this cause of concern, HMIC recommends that: <ul style="list-style-type: none"> • Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so. • Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. 	AMBER	December 2018	<u>Within 2 years</u> Vetting clearance is already embedded within recruitment processes. Steps are being taken ensure appropriate vetting levels are maintained for officers and staff transferring roles within force. A directory of roles requiring enhanced vetting is being compiled and responses from Directorates continues to be collated.

PEEL: Police Legitimacy 2016 - CoLP

A Force report by HMIC

Published December 2016

Total of 5 actions: 0 are national and outside the remit of City of London Police.

5 are relevant to the City of London Police, 2 are in progress (with an element of 1 now closed) and 3 are complete

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Areas for improvement The force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.	CLOSED	April 2017	Professional Standards implemented a questionnaire as part of the post complaint procedure to establish feedback from the complainant. This was trialled for a 3 month period however the force did not receive any replies. The use of an external agency to provide a feedback service has been considered but discounted on the basis of value for money.
				Complainants have regular and repeated contact with investigating officers throughout an investigation and have the ability to air concerns in relation to the investigation throughout. These can be escalated to the Appropriate Authority for an opinion where appropriate. PSD do not believe that any further action is required in this area.
		Corporate Communications has instigated a number of actions these are reported below:		
		GREEN	April 2017	Action Required: <div>I. Build communications channels both internal and external to enable information to be received.</div> <div>[1.2]</div> Current Position: CoL Procurement has been briefed and a process is underway to establish external audience views. In the interim the force will be using free online survey tools, with enhanced promotion via established

Recommendations & Areas for Improvement		Status	Due Date	Comment
				channels. Internally several new communication channels have been developed to facilitate seeking staff views, including the internal Comms Forum Technology options are also being reviewed to enable the force to gather views from across the organisation Small group meetings are now held with Chief Officers and are proving popular channels, such as breakfast with the AC, and ad-hoc musters and briefings attended by T/Commander Ops.
		GREEN	Original: April 2017	<p>Action Required:</p> <p>II. Engage with businesses in the City to establish if, via their internal communications functions, we can build a City workers' forum. [1.3]</p> <p>Current Position:</p> <p>Initial attempts to generate interest via the Community Bulletin or the Crime Prevention Association did not prove fruitful.</p> <p>The CoLP have now launched a fortnightly (electronic) news bulletin – Skyline. Promotion is ongoing with work to enable utilisation of CoL comprehensive distribution lists for access to business rate payers City Occupiers database to reach out to City communities as widely as possible.</p> <p>Discussions with City of London news publisher City Matters are being progressed with the intent of delivering a regular weekly or fortnightly column in paper.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
		GREEN	April 2017	<p>Action Required:</p> <p>III. Work with the Corporation of London to establish how we can work together to use their existing channels and tools to engage with the hard to reach communities within the City, such as via the City Resident magazine. [1.4]</p> <p>Current Position:</p> <p>Fortnightly electronic Skyline news bulletin has been launched with invitations sent via existing CoL and CoLP databases to subscribe (free). This is also being promoted at regular business and community engagement working groups.</p> <p>Working with City Resident Publication team to continue engagement via the City Resident magazine. They have committed to including contact details (on Twitter, Facebook etc) in Bengali.</p> <p>A City Police Communities page has been launched on Facebook for specific engagement with resident communities.</p>
		AMBER	<p>Original: April 2017</p> <p>Now due: February 2018</p>	<p>Action Required:</p> <p>IV. External website to be redesigned to include a 'you said, we did' section. [1.5]</p> <p>Current Position:</p> <p>2 designs for the force website have been produced that will bring force policing priorities to the fore and representing 'you said, we did'. It is anticipated that this will be implemented February 2018.</p>
		GREEN	April 2017	<p>Action Required:</p> <p>V. Have 'you said, we did' as content on our Twitter feed [1.6]</p> <p>Current Position:</p> <p>Twitter and Facebook activity took place between 24th April and 5th May 2017, including 'you said, we did' materials. An evaluation of the first</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				campaign is being undertaken. The content for a second wave of social media activity took place September 2017.
5	Areas for improvement The force should improve how it manages individual performance of its officers and staff.	AMBER	March 2017 Now due: February 2018	The force has established a Performance Development Action Plan with a timeline for delivery of February 2017. The Talent Development Strategy has been produced against this plan with its own delivery which was agreed at Strategic Workforce planning meeting December 2017.

PEEL: Police Efficiency 2016 CoLP

A Force report by HMIC
Published November 2016

Total of 5 actions: 0 are national and outside the remit of City of London Police.
5 are relevant to the City of London Police, 4 are complete and 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	Areas for improvement City of London Police should review the capabilities of its workforce so it can identify and put plans in place to address	AMBER	March 2017 [Internal deadline]	This work has been addressed in the Workforce Plan to an extent and further developed by the use of Deloitte consultants who have reported. Findings from the Deloitte report have been developed into a plan and a series of briefings to the workforce by Commander

Recommendations & Areas for Improvement		Status	Due Date	Comment
	any gaps. This will enable the force to be confident in its ability to meet current and likely future demand efficiently.		Now due April 2018	Operations took place in September 2017. A skills audit has been completed for police officers. A similar audit is being undertaken for Police staff and is due for completion in April 2018.

PEEL: Police efficiency 2015

An inspection of the City of London Police by HMIC

Published October 2015

Total of 2 actions: 0 are national and outside the remit of City of London Police.

2 were areas relevant to the City of London Police, 1 is still in progress.

Recommendation		Status	Due Date	Comment
2	To support the workforce plan, the force should improve how it records and retains information concerning the skills and knowledge of the workforce to identify future training needs.	AMBER	March 2016 [Internal deadline] Now due: April 2018	An initial skills audit for the workforce has been undertaken with a more detail review for Police Officers completed in September 2017. A similar work plan will commence in December 2017 for Police staff with a scheduled completion date of April 2018. Training requirements are being captured as part of the annual STRA process, thus informing the force training plan. The STRA identifies future needs.