

## 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  |
| RED                  | The recommendation should have been implemented but has not been due to resource issues or force capability to complete and remains outstanding |
| WHITE                | The recommendation is no longer required / relevant or is dependent upon another organisation.  |

Individual recommendations may require multiple tasks to be completed by task owners from across the force before they can be discharged. The schedule below details the owners of tasks against individual recommendations highlighting those which are outstanding.

## Out-of-court disposal work in youth offending teams

A national joint report by HMICFRS and HMI Probation  
Published March 2018

This report makes 11 recommendations, 5 are for the force and are in progress.

| Recommendations & Areas for Improvement |  | Status | Due Date                                | Comment   |
|---|--|--------|---|---|
| 4                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should:<br>Make sure that the requirements of youth conditional cautions are meaningful to children, and describe the desired outcomes and how these will be achieved. | AMBER  | No deadline specified within the report | The City of London does not have a dedicated Youth Offending Team owing to the low demand as most, if not all, of the youths that are apprehended and dealt with in the City of London are not resident in the City of London. The Force works with the YOT for which ever borough the youth is resident and has a working partnership arrangement with Hackney for all issues relating to Safeguarding. A baseline of data is being collated to establish how many youth |

| Recommendations & Areas for Improvement |  | Status | Due Date                                | Comment  |
|---|--|--------|---|--|
| 5                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should: Make sure that all victims have a fully informed and effective opportunity to have their views heard, and to receive an appropriate restorative intervention.  | AMBER  |   | conditional cautions we do give out when restorative interventions have been appropriate. This will allow the force to assess the extent of any further action it needs to take. |
| 6                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should: Make sure that children understand the implications of receiving an out-of-court disposal before they are asked to accept it.  | AMBER  |   |  |
| 10                                      | <b>Recommendation</b><br>Chief constables should make sure that referrals to YOTs are sufficiently timely to meet the needs of victims for speedy justice and achieve the objectives of out-of-court disposals; and make the YOT aware of all community resolutions given by the police. | AMBER  | No deadline specified within the report | Owing to the low numbers any referrals are generally made in a timely manner but again data is being examined to assess the extent of any improvement required.                  |
| 11                                      | Chief constables should make sure that they have clear and consistently applied policies for the gathering of fingerprints and other biometric information in youth caution and conditional caution cases.   | AMBER  |   | All fingerprints and other biometric information is gathered in accordance with the relevant PACE codes.   |

# PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS

Published March 2018

This report was published 22<sup>nd</sup> March 2017. There are 4 recommendations which apply to the force and are being progressed.

3 are in progress and shown as Amber, 1 is white as dependent upon CoP and NPCC

| Recommendations & Areas for Improvement |  | Status | Due Date       | Comment   |
|---|--|--------|----------------|---|
| 1                                       | <p><b>Recommendation</b></p> <p>By October 2018, all forces should review their own approach to neighbourhood policing to check whether the service they provide to local communities meets these guidelines. As soon as possible, they should make any changes they need to implement the guidelines.</p>   | AMBER  | October 2018   | <p>The College of Policing has completed the consultation phase on its Guidelines for Modernising Neighbourhood Policing with the intent of publishing a finalised version by end of April 18. However, it has not yet been published and Forces await this guideline document.</p> <p>The area of how our communities are serviced is part of the CoLP Transform Programme. A report was presented to the Transform Board on 25th April 18 re Community Engagement Services detailing early opportunities to focus on relevant areas of the Corporate Plan and the College of Policing's new (draft) Neighbourhood Policing Guidance with proposals re realignment of resources. Further update will be available at the next Performance Sub in November.</p> |
| 2                                       | <p><b>Recommendation</b></p> <p>By September 2018, all forces with a shortage in qualified detectives and/or other investigators should develop an action plan. The plan should set out in detail what the force will do to address the shortage in the short, medium and long term. It should be in line with the national plan to develop investigative capacity and capability that all chief constables in England and Wales have agreed.</p> <p>This plan should draw on the information in the force management statement about:</p> | AMBER  | September 2018 | <p>On 14th May NPCC (Investigator Resilience Programme Team) provided force(s) with a template action plan, advice and guidance which the force will use to develop their own local plan (drawing on work being developed at a national level).</p> <p>The force's current Workforce Plan 2018 - 2023 (v2.1 Dec 17) identifies that a high proportion of eligible detective retirees are in management or supervisory ranks.</p>  |

| Recommendations & Areas for Improvement |   | Status | Due Date                        | Comment  |
|---|---|--------|---------------------------------|--|
|   | <p>the investigative demand the force expects to face in the next four years; and</p> <p>how the force will change and improve the condition, capacity, capability, serviceability, performance and security of supply of its workforce and other assets to cope with that demand.</p> <p>To make sure the plans are consistent, the National Police Chiefs' Council lead on investigative resilience has agreed to provide advice on the areas each plan should cover by April 2018.</p> |        |                                 | <p>Recruitment plans over the next 5 years whilst focusing on maintaining uniform resilience will also ensure and allow that training of detectives occurs particularly to fill anticipated gaps in detective supervision.</p> <p>The Workforce Plan also identifies the continuing growth of cyber crime and that training will be required for a large proportion of force detectives in order that they can provide the service required to members of the public who report such offences to us.</p> |
| 3                                       | <p><b>Recommendation</b></p> <p>The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims. The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.</p>  | WHITE  | September 2018 And January 2019 | <p>This is dependent upon the CoP and NPCC.</p> <p>The Force Vulnerability Working Group Chair has been notified.</p> <p>The force lead for Vulnerability has recently been reassigned following a review of the Control Strategy and is now Supt Lee Presland who will be reviewing activities to date and going forward as part of role and will be keeping a watching brief on this.</p>  |
| 4                                       | <p><b>Recommendation-</b></p> <p>By September 2018, all forces should review how they are implementing changes to pre-charge police bail, working with the National Police Chiefs' Council lead.</p> <p>The review should include an assessment of how far vulnerable people are being affected by these changes.</p> <p>As soon as possible, forces should then put into effect any necessary changes to make sure they are using bail effectively,</p>                                  | AMBER  | September 2018                  | <p>Oversight of the Bail Act sits with Custody Management Group (with links to Vulnerability Working Group and potentially Victim Code and Crime Standards Working Group) where this recommendation has been considered and activities tasked accordingly.</p>   |

| Recommendations & Areas for Improvement |  | Status | Due Date | Comment |
|---|--|--------|----------|---------|
|   | and in particular that vulnerable victims get the protection that bail conditions can give them. |        |          |         |

## PEEL: Police Effectiveness 2017 – CoLP

A national report by HMICFRS

Published March 2018

This report was published 22<sup>nd</sup> March 2018. There are 5 Areas for Improvement for the force to progress.

2 are assessed as complete and 3 are Amber

| Recommendations & Areas for Improvement |  | Status | Due Date  | Comment  |
|---|--|--------|---|--|
| 1                                       | <p><b>Area for Improvement</b></p> <p>The force should review its process for sharing information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.</p> | AMBER  | <p>No deadlines set by HMICFRS</p> <p>Force to determine once levels assessed</p> | <p>There is a national Operation , Op Encompass which involves forces working with local authorities and nominated contacts in schools. However, to add context, the volume of children impacted by DA in the City is low.</p> <p>The PPU Inspector has details of Op Encompass scheme and will be raising at next Domestic Abuse SV forum (chaired by City of London Corporation) in June to seek views from the partnership as to how this might be managed in view of the levels of risk in the City.</p> |

| Recommendations & Areas for Improvement |   | Status       | Due Date                    | Comment  |
|---|---|--------------|-----------------------------|--|
| 2                                       | <b>Area for Improvement</b><br>The force should ensure that it is proactive in its approach to identifying and apprehending those who produce or share indecent images of children. | NEW<br>GREEN | No deadlines set by HMICFRS | <p>PPU work proactively in this area. They submit IP addresses from the CPSy which geolocate City locations. CoLP is also linked in with the relevant teams/groups regionally and nationally with NCA around this work.</p> <p>The cyber crime unit also undertake proactive work in this area on a regular basis and intelligence gleaned is either acted upon with follow up enquiries or passed to other forces as appropriate.</p>   |
| 3                                       | <b>Area for Improvement</b><br>The force should implement a process to obtain feedback from victims of domestic abuse.  | NEW<br>GREEN | No deadlines set by HMICFRS | <p>A Domestic Abuse Service Improvement Pilot Survey report was presented to the Force Performance Management Group in March 2018. This survey supports both this recommendation and the completion of a HO data return. The aim of the survey was to make positive changes to the service that domestic abuse victims receive. For the pilot the Independent Domestic Violence Advocate (IDVA) conducted telephone surveys with victims; as an addition to their current role.</p> <p>The pilot was deemed a success and, with some amendments such as the phrasing of certain questions to make them bespoke to COLP, is being adopted. It will be undertaken on a quarterly basis (to meet HO return) with evaluation informing service delivery updates.</p> |

| Recommendations & Areas for Improvement |   | Status | Due Date                    | Comment   |
|---|---|--------|-----------------------------|---|
| 4                                       | <p><b>Area for Improvement</b></p> <p>The force should enhance its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, partner agency powers, and other methods to deter organised criminals from continuing to offend.</p> | AMBER  | No deadlines set by HMICFRS | <p>A paper was presented to the force's Transform Programme board in April, proposing two options for enhancing CoLP's Lifetime Offender Management Services (supporting existing developments for IOM). The first option, the establishment of a central force unit within the I&amp;I Directorate was approved: this will result in the appointment of 4 x dedicated LOM Officers from existing resources (a mix of warranted and non-warranted officers). Delivering this ambition will form part of a new <i>Prevention Services</i> work strand, initially being led by D/Supt. Ollie Shaw until a permanent lead is identified.</p> <p><u>Next steps</u><br/>Appointment of lead to Prevention Services work strand<br/>Implementation of agreed option.</p>  |
| 5                                       | <p><b>Area for Improvement</b></p> <p>The force should strengthen its response to drug-dealing networks using 'county lines', to stop them inflicting violence and exploitation on local communities</p>  | AMBER  | No deadlines set by HMICFRS | <p>Context- Known as "county lines", gangs use children as young as 12 to traffic drugs, using dedicated mobile phones or 'lines'. It has been reported that 4,000 teenagers from London are being exploited and trafficked every year to sell drugs in rural towns and cities. However, evidence and intelligence suggests that the majority of these are recruited from greater London Boroughs in the Metropolitan Police Area. The demography of the City of London means that its community is not impacted in the same way as other London Boroughs. However, it is a possibility that those trafficking drugs may be part of the transient population that pass through the City.</p> <p>As first steps the force is currently developing a drug problem profile, detailing the nature and scope of drug use and supply within the City of London. This will also include the associated risks, effects and costs and will provide insight to help inform further actions if required.</p> |

# PEEL: Police Legitimacy 2017 – National

A national report by HMICFRS

Published December 2017 There are 2 recommendations which apply to the force 1 is assessed as GREEN and the other is being progressed.

| Recommendations & Areas for Improvement | Status | Due Date | Comment |
|---|--------|----------|---------|
|---|--------|----------|---------|



|   |   |       |           |   |
|---|---|-------|-----------|---|
| 1 | <p><b>Cause of concern</b></p> <p>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><b>Recommendation</b></p> <p>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> <ul style="list-style-type: none"> <li>the reasons for any disproportionate representation of different ethnic groups in the use of stop and search;</li> <li>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</li> <li>the prevalence of possession-only drug searches, and the extent to which these align with local or force level priorities</li> </ul> <p>Where forces identify disparities through monitoring, they should demonstrate to the public that they have:</p> <ul style="list-style-type: none"> <li>carried out research and analysis in an attempt to understand the reasons for the disparity, and</li> <li>taken action to reduce the disparity, where necessary;</li> </ul> <p>We expect forces to publish this analysis and any actions taken at least on an annual basis, <b>from July 2018</b></p> | AMBER | July 2018 | <p>In their national and force level report HMICFRS are utilising Office for National Statistics population statistics in determining their findings. For the City this means only the resident population is being considered.</p> <p>Source: ONS 2011 Census table KS201EW</p> <p><b>Current Position</b> - 2017/2018 stop and search data was produced by FIB for the Assistant Commissioner this analysed 307 S&amp;S reports, only 10 of which were for City residents. No disparity of concern was evident at this point.</p> <p>There is one area of work still progressing which is the dashboard to be amended to include the find rates by ethnicity across different types of search and separate identification of find rates for drug possession. However in relation to the drug searches these are not a local or force level 'priority' in the Local Policing Plan 2018-19. Additionally, outcomes by police unit / Officer to enable scrutiny by the Stop and Search and Use of Force working group are also being developed.</p> <p>Once the relevant analysis commentary has been prepared by the Force Intelligence Bureau to accompany the statistics it will be published on the force website as soon as possible.</p> |
|---|---|-------|-----------|---|

|   |   |           |           |  |
|---|---|-----------|-----------|--|
| 2 | <p><b>Recommendation</b><br/> <b>By July 2018</b>, 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> | NEW GREEN | July 2018 | <p>A training Plan and programme of dates is now in place to ensure that all officers who have not already been trained, receive the requisite training between May and December 2018. L &amp; D are responsible for ensuring that new recruits and relevant transferees receive the training as part of their induction. The stop and search training being delivered was designed by the College of Policing for use by all forces and incorporates unconscious bias training.</p> <p>Please also see update in Outstanding References for fuller details and the programme of training dates.</p> |
|---|---|-----------|-----------|--|

## PEEL: Police Legitimacy 2017 – CoLP

A force report by HMICFRS

Published December 2017

Action plan owner: There is no overall plan owner assigned since the Areas for Improvement span distinct and separate areas of the force.

There were 7 areas for improvement which applied to the force, 5 have been completed and closed and 2 continue to be progressed.

| Recommendations & Areas for Improvement |  | Status | Due Date                       | Comment   |
|---|--|--------|--------------------------------|---|
| 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  | Force deadline set August 2018 | <p>This area for improvement was originally cited within the PEEL Legitimacy 2016 force level report.</p> <p>Progress already reported to HMICFRS includes:</p> <ul style="list-style-type: none"> <li>The Talent Management Strategy and its associated working group</li> <li>Establishment of a Performance Development Action Plan</li> </ul> |

| Recommendations & Areas for Improvement |  | Status | Due Date    | Comment  |
|---|--|--------|-------------|--|
|   |  |        |             | <p>The introduction of an electronic PDR system which was launched on the 30<sup>th</sup> April will provide the force with the ability to better analyse outcomes and take any appropriate correction actions.</p> <p><b>Next steps</b><br/>Strategic Development met with HR SMT in June to determine future activities inc evaluation of implementation (compliance) and end of year reporting.</p> |
| 7                                       | The force should improve its understanding of its workforce's wellbeing and use this to prioritise the services it provides. | AMBER  | August 2018 | <p>The force has a well-being action plan, champion and a well establish network group.</p> <p>A draft wellbeing framework has been produced pending signoff and publication at which point this will be green.</p>  |

# PEEL: Police Efficiency 2017 – National

A force report by HMICFRS

Published November 2017

Action plan owner: There is no overall plan owner assigned since the content spans distinct and separate areas of the force.

. 1 advisory note has been chosen by the force which has also now been completed.

| Recommendations & Areas for Improvement |  | Status       | Due Date  | Comment   |
|---|--|--------------|-----------|---|
| 2                                       | <p><b>The fore has chosen to act on an advisory note within the national report.</b></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> | NEW<br>GREEN | June 2018 | <p>The workforce plan has recently been refreshed and will contribute to the production of the HMICFRS Force Management Statement due for completion June 2018.</p> <p>However the Workforce Plan projects over a 3 year period, whilst this advisory stipulates 5 years. The forces ability to establish meaningful projections for the additional 2 years is being considered.</p> <p>The Force's STRA process will commence again in August and will again look at future demand and skill gaps which will feed into the Next iteration of the Workforce plan. This is an iterative process.</p> |

# PEEL: Police Efficiency [including leadership] 2017 - COLP

A force report by HMICFRS

Published November 2017

Action plan owner: There is no overall plan owner assigned since the identified AFIs spans distinct and separate areas of the force.

There are 4 Areas for Improvement apply to force, these are being progressed.

2 are complete and 2 are in progress and are shown as Amber

| Recommendations & Areas for Improvement |   | Status | Due Date  | Comment  |
|---|---|--------|---|--|
| 1                                       | <p><b>Areas for improvement</b></p> <p>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.</p> | AMBER  | <p>Internal deadline set to align with PEEL</p> <p><b>August 2018</b></p> | <p><b>Task Required</b></p> <p>Fully implement a benefits management process within force, creating a governance structure that ensure this becomes business as usual.</p> <p><b>Current position</b></p> <p>The Force engaged consultants, to produce an initial assessment of the position which resulted in a report in February 2018 'Discovery and scoping'. This was backed up with a workshop attended by the force Senior Management.</p> <p>A draft benefits management toolkit was presented to the Force Change Portfolio Board on the 14<sup>th</sup> June and was signed off by the board.</p> <p>Work to communicate the approach and the toolkit and training/ awareness support to the business and those involved in projects and programmes who will ultimately have responsibility for tracking and delivering on the benefits is to commence next.</p> |

| Recommendations & Areas for Improvement |   | Status | Due Date  | Comment   |
|---|---|--------|---|---|
| 3                                       | <p><b>Areas for improvement</b></p> <p>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.</p> | AMBER  | Deadline set for November 2018 to align with PEEL | <p>This is all part of the STRA process which will commence in July/ August 2018.</p> <p>Templates for the Operational requirement will go out in July for completion and return by September. Challenge Panels will take place in first week of October. I&amp;I will be looking to design a standardised growth / bid template to make the read across between STRA, Corp Plan and Transform easier.</p> <p>This will be a crucial factor in ensuring the Transform programme reviews the structure of the force to deliver the optimum level of service at the right cost in the future.</p> |

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

A national report by HMICFRS  
Published October 2017

Action plan owner: DCI Edelle Michaels [force SPOC modern slavery and human trafficking]

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

| Recommendations & Areas for Improvement |   | Status | Due Date     | Comment  |
|---|---|--------|--------------|--|
| 2                                       | <p><b>Recommendation</b></p> <p>Within twelve months, forces should review their leadership and governance arrangements for modern slavery and human trafficking, to ensure that:</p> <ul style="list-style-type: none"> <li>• senior leaders prioritise the response to modern slavery and human trafficking;</li> <li>• every incident of modern slavery identified to police is allocated appropriate resources with the skills, experience and capacity to investigate it effectively;</li> <li>• forces develop effective partnership arrangements to co-ordinate activity in order to share information and safeguard victims; and</li> <li>• Performance and quality assurance measures are in place to allow senior leaders to assess the nature and quality of the service provided to victims.</li> </ul> | AMBER  | October 2018 | <p>To add context to this recommendation, the numbers of modern slavery incidents/ crime in the City are low.</p> <p>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</p> <p>The force is represented at the Modern Slavery and Human Trafficking practitioners meeting which is attended by partners and agencies.</p> <p>A report was submitted to Police Committee on 12<sup>th</sup> April 18 seeking authority to sign a Section 22A Collaboration Agreement which was approved. Some minor details are still to be resolved with Legal before signature.</p> <p>The Regional Co-ordinator from Eastern Region Special Operations Unit (ERSOU) attended COLP on 28th March 2018 to provide a peer review on current 4P action plan and found it to be more than satisfactory.</p> <p>All incidents or intelligence is drawn to the attention of the force lead, their deputy and the FIB analyst for review.</p> <p>With regard to the Performance and QA to assess nature and quality of services to victims- It has been proposed that a vulnerability dashboard be developed which incorporates monitoring data on modern slavery and human trafficking. The</p> |

| Recommendations & Areas for Improvement |   | Status | Due Date  | Comment  |
|---|---|--------|---|--|
|   |   |        |   | lead for Vulnerable Persons has recently been reassigned to Supt UPD who will review existing activity and activities.   |
| 4                                       | <b>Recommendation</b><br>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 possible. | RED    | April 2018<br>(HMICFRS set deadline - Force has signed up to Section 22 Collaboration Agreement in line with deadline | <p>At the current time the force engages with modern slavery and human trafficking partners and agencies on a monthly basis.</p> <p>The force has signed up to the National S22 Collaboration Agreement which enables the force to</p> <ul style="list-style-type: none"> <li>• Access products, process and good practice in order to get learning and understanding around MSHT embedded into forces, including access to the National Head of Insight and Analysis and the National Head of Operations and Development and their teams; and</li> <li>• Have ability to request bespoke assistance in furthering strategy, policy, operational or analytical efforts by drawing on advice from specialists from the national team funded through the transformation programme.</li> </ul> <p>The lead for Modern Slavery is investigating what information sharing agreements, are already in place to see if there are any gaps. There is already and ISA in existence with the City of London Corporation.</p> <p>Initial examination indicates that further ISAs may be required with GLA, Immigration and Salvation Army. Unfortunately, dealing with these other agencies is not a speedy process and HMICFRS's 6 month deadline was probably a little ambitious.</p> |



| Recommendations & Areas for Improvement |   | Status    | Due Date  | Comment   |
|---|---|-----------|-----------|---|
| 5                                       | <b>Recommendation</b><br>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. | NEW GREEN | Immediate | <p>The standing operating procedure [SOP] deals specifically with offenders who may also be victims in these circumstances.</p> <p>The SOP has been reviewed and published March 2018 and remains on annual review.</p> <p>There is also a specific section on the force intranet which offers guidance, advice and external contact details for officer use.</p> <p>The Force is confident that the S 45 defence will be considered as appropriate in cases.</p> <p>Local processes are under review to see if it is possible to flag S45 defences for supervisory review on the NICHE system, which would further enhance the Force's response.</p> |

## 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, 4 are now complete and 1 is a regional / national issue and is shown as white.

| 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 | NEW GREEN | HMICFRS: January 2018 | A full report on this issue was submitted to the Police Committee on the 24 <sup>th</sup> May 2018. A joint London Disclosure Improvement Plan [MPS, CoLP and CPS) has been signed-off and published March 2018 and builds on the Joint National Disclosure Improvement Plan. The joint plan represents a shared commitment to make sustainable change to |

| Recommendations & Areas for Improvement |  | Status    | Due Date              | Comment  |
|---|--|-----------|-----------------------|--|
| 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  | NEW GREEN | HMICFRS: January 2018 | the way force exercises its duties of disclosure and fully supports the aims of the national plan. It covers improvements in the areas of capacity, capability, leadership, partnership and governance, which mirrors the national plan.<br>To support delivery of these plans the following has occurred.   |
| 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 | WHITE     | July 2018             | <ol style="list-style-type: none"> <li>1) CoLP Disclosure Improvement Strategy April 2018 documented</li> <li>2) Internal Gold Group (chaired by Commander Ops) is monitoring delivery of CoLP actions within joint London Disclosure Improvement Plan (meetings held fortnightly)</li> <li>3) Inter-agency Diamond Group (attended by Commander Ops) will monitor delivery of joint aspects of joint London Disclosure Action Plan</li> <li>4) Tactical Delivery Group (chaired by D/Supt Crime)</li> </ol>   |
| 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   | NEW GREEN | HMICFRS: January 2018 | <p>Work of the Gold Group to date has included:</p> <ul style="list-style-type: none"> <li>• Capacity and capability- A full review of all outstanding CoLP Sex Offence prosecutions and dip sampling of other types of cases e.g Economic Crime, to check for any issues. No issues have been identified to date.</li> <li>• Capability- Training on Disclosure is being refreshed and made mandatory with an NCALT package, with 'Disclosure Champions' being identified across all of the operational Directorates to promote awareness. The Champions are receiving enhanced training. Infographics and other products issued by the College of Policing are also being used to raise awareness and ensure learning amongst officers.</li> <li>• Capability- Scoping of the E-discovery system which will enable greater/easier interrogation of digital media. This is currently going to tender and is also subject to funding being identified. Implementation is estimated to be in 6 months minimum.</li> <li>• Leadership and governance- Commander Operations and Security is leading on this area for the Force, chairing the Gold Group, and has</li> </ul> |

| Recommendations & Areas for Improvement |  | Status | Due Date | Comment   |
|---|--|--------|----------|---|
|   |  |        |          | <p>issued a number of Force wide communications giving direction regarding disclosure and reasonable lines of enquiry. Additionally, the issue of disclosure was discussed and given oversight at the Organisational Learning Forum on the 3rd May 2018, which is chaired by the Assistant Commissioner and attended by the Town Clerk's Policy and Projects officer for Police.</p> <ul style="list-style-type: none"> <li>• Governance- the national recommendations from the joint HMICFRS/ HMCPSI from July 2017 being monitored through the HMICFRS update to the Performance and Resource Management Sub Committee (and at its meeting on 26<sup>th</sup> April asked for action to be taken to implement this as GREEN).</li> <li>• Governance/ Partnerships- As aforementioned in terms of partnership, CoLP, the MPS and CPS London have a joint improvement plan that all are working towards. Also an NPCC lead group (Assistant Chief Constable level) has been established and the Force is fully linked in to this.</li> </ul> <p>Most recently NPCC Disclosure Lead event held on 8<sup>th</sup> May attended by D/Supt ECD and the Force is well linked into further developments being taken forward nationally. The Commissioner is confident that the force is doing all it can to mitigate risk in this area.</p> |

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

A joint national report by HMCPSi and HMIC

Published July 2017

Action Plan Owner: DI Anna Rice

There are 22 recommendations; 4 of which apply to forces to be progressed but are dependent upon further direction from the NPCC lead, ACC Gary Shewan.

| 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  | <p>A national stance has been taken on these recommendation by the NPCC lead for Stalking &amp; 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 &amp; Police action plan which will be issued from the NPCC lead– these are still pending Head of PPU continues to chase.</p> <p>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.</p> <p>The College of Policing has consulted forces on an alternative to PINS.</p> <p>Status is held at WHITE until the receipt of the joint action plan above from the national lead.</p> |
| 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 HMIC - force to determine its own deadlines |  |
| 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  | No deadline set by HMIC - force to determine its own deadlines |  |

| Recommendations & Areas for Improvement |   | Status | Due Date   | Comment |
|---|---|--------|--|---------|
| 11                                      | Chief constables and CPS Area leads should monitor and ensure compliance with the national stalking protocol. | WHITE  | No deadline set by HMIC - force to determine its own deadlines |         |

## PEEL: Police Effectiveness 2016

A National report by HMIC

Published March 2017

There are 5 recommendations; 4 of which apply to force. 2 are complete, 1 is closed because London does not have a ROCU and 1 is white pending the release of national guidance.

| Recommendations & Areas for Improvement |   | Accepted | Status | Due Date                                      | Comment  |
|---|---|----------|--------|---|--|
| 1b                                      | <p><i>Context: In Recommendation 1a the College of Policing working with the NPCC and APCC should issue national guidance setting out the essential elements of neighbourhood policing which all forces should provide. This to be completed by December 2017.</i></p> <p><b>Recommendation 1b</b><br/>Immediately after the national guidance has been issued, all forces should review their own approach to neighbourhood policing to determine whether the service they provide to local communities meets these guidelines. As soon as practicable</p> | Y        | WHITE  | To be set once national guidance is published | The College of Policing has completed the consultation phase on its Guidelines for Modernising Neighbourhood Policing but the guidelines have still not been published. A report was presented to the Transform Board on 25th April 18 re Community Engagement Services detailing early opportunities to focus on relevant areas of the Corporate Plan and the College of Policing's new (draft) Neighbourhood Policing Guidance with proposals re realignment of resources. |

| Recommendations & Areas for Improvement |   | Accepted | Status | Due Date | Comment   |
|---|---|----------|--------|----------|---|
|   | thereafter, they should put into effect any necessary changes to implement the national guidance. |          |        |          | Further reports are due to be presented to the Transform Board in June. |

## PEEL: Police Effectiveness 2016 - CoLP

A Force report by HMIC

Published March 2017

There are a total of 13 actions for the force. 12 are complete and 1 is in progress

| Recommendations & Areas for Improvement |   | Status | Due Date   | Comment  |
|---|---|--------|--|--|
| 12                                      | <b>Areas for improvement</b><br>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. | RED    | Sept 17<br>[internal deadline]<br><br>Now due:<br>September 2018 | <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>Tactics are reviewed at Directorate level serious and organised crime meeting to ensure opportunities are maximised.</p> <p>Analysis to understand which tactics are having best affect has commenced but operational priorities have taken precedence and with limited analyst capability, FIB has yet to conclude this work.</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 2 are complete and 1 in progress.

| Recommendations & Areas for Improvement                     |  | Status       | Due Date  | Comment  |
|---|--|--------------|---|--|
| <b>Areas for Enhancement</b><br>Enhance monitoring data on: |  |              |   |  |
| 1   | the reason for searches (e.g. drugs) by ethnicity and age                            | RED          | April 2017<br>[internal<br>deadline]<br><br>Due:<br>January<br>2018 | <b>Current position:</b><br>Analysis of the reasons for searches by ethnicity and age remain outstanding. This is being developed. |
| 2   | the rate at which the item searched for is found, by ethnicity and age               | NEW<br>GREEN |   |  |
| 3   | Individual officer/team data – totals, outcomes and find rate, by ethnicity and age. | NEW<br>GREEN |   |  |

# 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                                       | <b>Cause of concern</b><br>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     | The Head of Professional Standards confirms that current national vetting standards are being complied with.<br><br>New guidelines were expected in early 2017 but their publication has been delayed with no new timescale announced.<br><br>The Professional Standards Control Strategy has been produced and vetting is fully referenced in it.  |
|   | <b>Recommendation</b><br>To address this cause of concern, HMIC recommends that: <ul style="list-style-type: none"> <li>• Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so.</li> <li>• Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles.</li> </ul> | AMBER  | December 2018 | <u>Within 2 years</u><br>Vetting clearance is already embedded within recruitment processes.<br><br>A directory of roles requiring enhanced vetting is being compiled and responses from Directorates continues to be collated.<br><br>Human Resources will reflect the vetting level of the post on their Human Resource System once these have been ascertained in consultation with PSD. |



| Recommendations & Areas for Improvement |  | Status | Due Date | Comment   |
|---|--|--------|----------|---|
|   |  |        |          | As at 23th May 2018 there are 52 existing officers and staff who's vetting is subject to renewal, this are being progressed but this is being undertaken along with all other vetting demand for recruitment. |