

## City of London Police HMICFRS Inspections – Action Plan – up to 31<sup>st</sup> July

Further updates are due on ALL Inspections at the September Strategic Planning & Performance Committee.

Traffic Light Colour	Definition of target achievement
<b>GREEN</b>	The recommendation is implemented
<b>AMBER</b>	The recommendation is subject to ongoing work and monitoring
<b>RED</b>	The recommendation should have been implemented but has not been due to resource issues or force capability to complete and remains outstanding

### Police super-complaint<sup>1</sup>: police data sharing for immigration purposes

A Joint national report following an investigation by HMICFRS, College of Policing and the Independent Office for Police Conduct  
Published 17<sup>th</sup> December 2020

Recommendations & Areas for Improvement		Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of travel
4	<u>Recommendation</u> With reference to recommendation 1, and in consultation/collaboration with local or national specialist organisations, chief constables should take steps to ensure that all migrant victims and	<b>AMBER</b>	February 2021 for initial review [completed]	Following initial review of the report recommendation it has been determined that completion of this action is,	<b>AMBER –</b>	

<sup>1</sup> The police super-complaints system allows designated organisations to raise issues and became operational on 1st November 2018. Individuals cannot make super-complaints. Super-complaints can only be submitted by organisations designated by the Home Office. Designated bodies may submit super-complaints for consideration by HMICFRS, the College of Policing and the IOPC.



Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of travel
<p>witnesses of crime are effectively supported through safe reporting pathways to the police and other statutory agencies. They should:</p> <ul style="list-style-type: none"> <li>ensure there is a proper policy and practice framework in place for officers to work within;</li> <li>develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and:</li> <li>draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation;</li> <li>are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status;</li> <li>are clear about the circumstances in which information will be shared by police with immigration enforcement;</li> <li>provide clarity about the purpose of sharing information at different points of the pathway; and</li> <li>explicitly recognise the importance of telling victims, witnesses and supporting agencies whether information will be shared with</li> </ul>		<p>July 2021 for the review of relevant forces SOPs although compliance with this recommendation is dependant upon delivery of recommendation 3 by the Home Office and NPCC</p>	<p>in part dependant upon the Home Office and NPCC to develop a safeguarding protocol [recommendation 3].</p> <p>Currently there is no timeline for deliver by the Home Office and NPCC and the force maintains a watching brief.</p> <p>In the meantime, force SOPs are to be reviewed to ensure adequate guidance and signposting.</p>	<p>This remains at AMBER - due for completion at end July.</p> <p>Further update due at Sept SPPC</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of travel
<p>Immigration Enforcement, and if so, when and in what circumstances.</p> <ul style="list-style-type: none"> <li>• promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse;</li> <li>• promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status;</li> <li>• ensure the policy and practice framework is adopted by all officers and staff who come into contact with victims of crime who have insecure immigration status; and</li> <li>• promote police engagement in regular outreach community work, as highlighted as good practice in this report.</li> </ul>					
<p>8</p> <p><u>Recommendation</u> To all recipients of recommendations from this investigation</p> <p>Provide an update to Her Majesty's Chief Inspector of Constabulary on progress in implementing these recommendations within six months of the date of publication of this report.</p>	<p>AMBER</p>	<p>June 2021</p>	<p>Strategic Development report the progress of all open actions to our HMICFRS Force Liaison Lead.</p> <p>Action plans for new reports are also to be</p>	<p>GREEN</p> <p>This is now Green- Strategic Development report the progress of all open actions to our HMICFRS Force Liaison Lead].</p>	

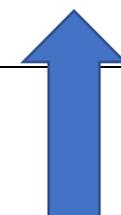
Recommendations & Areas for Improvement		Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of travel
				produced in consultation with the HMICFRS FLL.	Action plans for new reports are produced in consultation with the HMICFRS Force Liaison Lead and this practise will continue.	

## Pre-charge bail and released under investigation: striking a balance

A Joint National report, HMICFRS and HMCPSi

Published 8<sup>th</sup> December 2020

Recommendations & Areas for Improvement		Status	Due Date shown at May SPPC	Comment	Position at End of July	Direction of Travel
8	<u>Recommendation</u> Forces should develop processes and systems to clearly show whether suspects are on bail or RUI. This will help them to better understand the risk a	AMBER	March 2021 [completed]	Following initial review, a report is to be produced for June 2021 Crime Standards Board – this will document existing	GREEN This is now GREEN	



Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at End of July	Direction of Travel
suspect poses to victims and the wider community and will help to increase safeguarding.		June 2021 for a report to CSB	practises and safeguarding identifying any additional measures that have been put in place to address apparent gaps. It is anticipated this will be a joint [Custody Manager, Crime DCI] report.	The use of bail and RUI is monitored at the Offender Management group, including trends. Niche reports are produced fortnightly and distributed. The Domestic abuse SOP clearly states the starting position bail, any discission to RUI must be fully justified. PPU report that if the suspect is not charged straight away the vast majority are bailed with conditions.	

## Roads Policing – Not Optional

A National report HMICFRS

Published 15<sup>th</sup> July 2020

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end July	Direction of Travel
<p>6</p> <p><u>Recommendation</u></p> <p>With immediate effect, chief constables should make sure:</p> <ul style="list-style-type: none"> <li>• [1]their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area;</li> <li>• [2]that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and</li> <li>• [3]there is evaluation of road safety initiatives to establish their effectiveness.</li> </ul>	<b>AMBER</b>	<p>September 2020 for an initial position</p> <p>November 2020 for review and reinstatement of the RDR Partnership by the CoL</p> <p>Deadline now April 2021 [subject to review]</p>	<p><u>[bullet 1] analytical capability</u></p> <p>Sustained analytical support has been an issue for the Roads Policing unit previously. The Force Intelligence Unit, who provide this support is aware of the issue and intends to produce a dashboard on a quarterly basis. The next quarterly dashboard [post January 2021] will be produced, although the data to support it will be lower in volume - reduced due to the impact of Co-vid on traffic in the City.</p> <p>The City of London partners have no analytical capability.</p>	<p>AMBER</p> <p>Remains AMBER as deadline reviewed to July 2021 for an update on progress.</p> <p>This action involves CoL partners.</p> <p>Further update due at September SPPC</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end July	Direction of Travel
			<p>The Road Danger Reduction [RDR] Partnership meetings, lead by the City of London Corporation, have been suspended until early 2021. A meeting took place on the 11<sup>th</sup> January 2021, to set out expectations. No analysis reports were submitted.</p> <p><u>[bullet 2] Information shared</u></p> <p>Dashboards produced will be shared.</p> <p>A RDR partnership meeting has been scheduled by the CoL [13th April 2021] and the Force Intelligence Bureau has produced a</p>		

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			<p>6 monthly report for the meeting.</p> <p><u>[bullet 3] evaluation of road safety initiatives</u></p> <p>This area requires development in partnership with the City of London. A meeting took place with the City's Strategic Transportation Team lead to discuss and these will be monthly moving forward.</p> <p>However, the expectation is very much that City of London Police provide the analysis for the City of London to use.</p>		

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			<p>This issue needs to be considered by the RDR partnership.</p> <p>At this time only City of London Police officers are undertaking operational RDR initiatives – evaluation of this initiative are yet to be evaluated by the partnership meetings.</p>		
<p>15</p> <p><u>Area for Improvement</u></p> <p>The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.</p>	<p>AMBER</p>	<p>September 2020 [subject to review]</p> <p>Now November 2020 [subject to input from CoL]</p>	<p>The responses below are provided within the context of this area for improvement within the HMICFRS report:</p> <p>Data collation and analysis, evaluation and effectiveness of the Road Danger Reduction partnership need to be better – the restoration</p>	<p>AMBER</p> <p>Remains AMBER as deadline reviewed to July 2021 for an update on progress.</p> <p>This action involves CoL partners.</p> <p>Further update due at Sept SPPC</p>	

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		<p>Extended to April 2021 [subject to review]</p>	<p>of RDR partnership meetings [11/1/2021] will assist together consideration of analysis reports at the meetings.</p> <p>The force has an analysis report for presentation to the 13<sup>th</sup> April 2021 RDR partnership meeting.</p> <p>The force does use the Crash system to report to DfT and TfL, although with the caveat of data accuracy.</p> <p>Progress is linked to 6 above; deadlines have therefore been aligned.</p>		

## Crime Data Integrity inspection 2019

A force report by HMICFRS

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
<p>6</p> <p><u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community resolutions, to make sure it only issues them in accordance with national guidance.</p>	<p><b>RED</b></p>	<p>February 2020</p> <p>Extended to July 2020 but need to be reviewed [Reported to PAB]</p> <p>Extended to September 2020 to ensure improvements are embedded</p> <p>Extended to July 2021</p>	<p>Audit results have not met the desired standards and further steps are now being taken:</p> <ul style="list-style-type: none"> <li>• The Community Resolution process is being digitised – roll out imminent.</li> <li>• Guidance will be re-issued to officers for Community Resolutions, penalty notices for disorder and Cannabis Warnings</li> <li>• A 3 step escalation process for failures is being implemented, at the highest levels this could lead to management action of officers.</li> </ul>	<p>AMBER</p> <p>Now AMBER- In April 2021 oversight was redesignated to the Head of Local Policing Chief Supt who has created a bespoke team of officers to drive the performance forward. This has firstly taken the form of revised guidance of what is expected and what is required when issuing Cannabis Warnings/Community Resolution/PND . Bi weekly audits are now being conducted and this is personally sent to the Head of Local Policing to look at trends and areas of failure. He is personally taking responsibility to</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
			<ul style="list-style-type: none"> <li>• Monthly audits will be conducted; failures reported to Supt Ops UPD</li> <li>• The force Corporate Communications department will be engaged to support messaging</li> <li>• Digitisation of Cannabis Warnings and PND will be pursued.</li> </ul> <p>Initial improvements were observed but not sustained and additional management actions is necessary.</p> <p>Consideration was being given to the implementation of the 2 Tier process, however the Ministry of Justice is instigating it own [formal]</p>	<p>Speak with every officer and supervisor for failed OOC disposals to seek an explanation and understanding of why the incident failed within the audit. This learning is being cascaded back to the staff/teams to ensure onward compliance.</p>	

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			<p>plans in this area – this is unlikely to achieve royal assent until the end of 2021</p> <p>The intention of the changes is to deliver a system that is more transparent to the public, more streamlined for officers and ensured offenders always have conditions attached to the outcome, focusing on rehabilitation and victim reparation.</p> <p>Any agreed transition would require changes to process and training for officers.</p> <p>The deadline has been extended to July 2021 [subject to review] to establish if the Ministry of Justice plans are progressing and to</p>		

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
			determine if management action has improved existing practises.		

## The Poor Relation - The police and CPS response to crimes against older people

A national report by HMICFRS  
Published July 2019

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
<p>10 Cause of concern Some victims may not be receiving support services, and some support services don't work as well as they could. This is because the police don't always refer victims when they should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.</p> <p><u>Recommendation</u></p>	RED	<p>January 2020</p> <p>Extended to November 2020 [Previously Reported to PAB]</p> <p>extended to February</p>	<p>The HMICFRS report recognises the good work of Economic Crime Victim Care Unit (ECVCU). There has been activity against this recommendation; dip sampling to ensure victim code of practise</p>	<p>AMBER</p> <p>Now AMBER</p> <p>Under Transform the need for a champion has been recognised to work within the Force Resolution Centre.</p> <p>Recruitment for this</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
<p>Within six months, chief constables should work with police and crime commissioners and their mayoral equivalents, and other relevant organisations, to review whether victim support services can be provided in a better way.</p>		<p>2021 for review</p> <p>Now July 2021 pending appointment of a force Victim Champion</p>	<p>has been complied with – findings reported to Force Crime Standards Board.</p> <p>With regard to non-economic crime victims: The force undertakes dip samples to identify learning which is then reported to the Crime Standards Board, these dip samples include qualitative checks on the service provided.</p> <p><u>Next Steps</u> Evidence that victims services have been reviewed [with partners] to establish if they can be enhanced, is still required.</p> <p>This element was being progressed by the force Victim Champion via</p>	<p>role will commence following internal signoff.</p> <p>This position has not been filled at this time – the deadline is extended to October 2021 accordingly, in the meantime DCI Mountford, DCI Lowe, and T/DSU Little (previous Victim Champion) have met and discussed the action plan for implementation.</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position at end of July	Direction of Travel
			<p>Virtual victim journey workshops. However progress has stalled with the secondment of the victim champion to another role.</p> <p>Under Transform the need for a champion has been recognised to work within the Force Resolution Centre. Recruitment for this role will commence following internal signoff.</p> <p>This position is unlikely to be filled before July 2021 – the deadline is extended accordingly, in the meantime a senior officer has volunteered to progress in addition to their existing duties.</p>		

# PEEL 2018/2019

A force report by HMICFRS

Published May 2019

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end July	Direction of Travel
<p>2</p> <p><u>Area for Improvement</u> The force should implement a process to get feedback from vulnerable victims.</p>	<p><b>RED</b></p>	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Reset to June 2020 [Reported to PAB]</p> <p>Extended to November 2020 subject to review</p> <p>Extended to April 2021</p>	<p>The requirement to survey domestic abuse victims is a mandatory home office return. Previously performed by the Vulnerable Victim Advocate [VVA], when funded by MOPAC and the force. In 2019 MOPAC redirected funding away from the City and the force now has access 2.5 days per week to an Independent Domestic Violence Advocate [IDVA] under the Pan London Victim and Witness Scheme. Vetting and recruitment [victim support] delayed the starting of the IDVA. Although the force now</p>	<p>AMBER Now AMBER.</p> <p>Current funding/VVA arrangements are not seen as a long term fix and the POCA bid included an element to commission an independent review of the Domestic Abuse/Vulnerable victim service provided across the City to include VVA, MOPAC, IDVA and the services the corporation provide.</p> <p>The full review report focused on Women and Girls [standing together] support has been circulated to Vulnerability</p>	

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		<p>[subject to review]</p> <p>Now July 2021</p>	<p>has access to an IDVA the Head of Domestic Abuse Services at Victim Support stated that surveying falls outside the scope of this role.</p> <p>This HMICFRS area for improvement seeks Domestic Abuse surveying to be expanded to other vulnerable victims – increasing demand.</p> <p>The way ahead has been discussed with the Corporation and a successful bid for POCA funds to Safer City Partnership [18/9/2020] has been made. The Head of PPU has agreed an expansion of the service with victim support, who recruited a new VVA but</p>	<p>Steering Group [June 2021] and a draft joint strategic action plan developed which incorporates actions relating to VVA funding.</p> <p><u>Deadline Rationale</u></p> <p>A revised deadline of October 2021 is set to review the current position regarding surveys and to establish progress on actions regarding future funding of the VVA.</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end July	Direction of Travel
			<p>they failed to start in April 2021. Victim support are re-advertising.</p> <p>This is not seem as a long term fix and the POCA bid included an element to commission an independent review of the Domestic Abuse/Vulnerable victim service provided across the City to include VVA, MOPAC, IDVA and the services the corporation provide.</p> <p>A report is expected to be available for the June 2021 Vulnerability Working Group.</p> <p><u>Deadline Rationale</u> A revised deadline of July 2021 is set to review the current position for the</p>		

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end July	Direction of Travel
			recruitment of the VVA by victim support and to receive the independent report.		

## Understanding the difference: the initial police response to hate crime

A national joint report by HMICFRS  
Published July 2018

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end of July	Direction of Travel
<p>8</p> <p><u>Recommendation</u> Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> <li>We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of</li> </ul>	RED	<p>December 2020</p> <p>Then February 2021</p> <p>Now June 2021 to enable</p>	<p>Following consultation completed November 2019, the College has now published this APP [late 2020] and it is now been considered by the force however this has coincided with the transfer of responsibilities for Hate</p>	<p>AMBER</p> <p>This is now AMBER. Of the 5 actions set out in the previous column, Task 1 and 3 have now been completed and are green.</p>	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end of July	Direction of Travel
<p>response to establish if it is still appropriate and relevant for forces</p> <ul style="list-style-type: none"> <li>• We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.</li> </ul>		Sector Policing to embed changes from Transform implementation	<p>Crime and the implementation of Transform.</p> <p>The following actions have been developed:</p> <ol style="list-style-type: none"> <li>1) PPU will review the current SOP to include the new links to APP and the need to follow the minimum standard of response</li> <li>2) Sector Policing will then take ownership of the SOP and are going to make the required changes relating to the governance (SRO, deputies etc, and how feeds in to VWG/VSG. PPU [DI] will remain investigation lead.</li> <li>3) T/DCI Crime will incorporate Hate Crime in to the Dip Sampling schedule. Showing internal scrutiny</li> <li>4) Once the additional VVA post is in</li> </ol>	The deadline for actions 2, 4 and 5 has been extended to October 2021 to progress further and report.	

Recommendations & Areas for Improvement	Status	Due Date shown at May SPPC	Comment	Position as at end of July	Direction of Travel
			<p>place [commencing shortly] – the independent survey of victims of hate crime</p> <p>5) External scrutiny, Sector Policing ensure arrangement are in place via the IASG.</p> <p>The deadline has been reset to June 2021 to enable Sector Policing to embed necessary changes</p>		