Metal Theft Scrutiny Commission

Final report

Councillors Brathwaite (Chair), Bigham, Kingsbury, Ogden and C. Whelan OBE

March 2013

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Executive Summary

The report considers the scale and impact of metal theft in the London Borough of Lambeth. It examines the roles and responsibilities of the various council departments and identifies that the council does not currently have a clear understanding of the local scrap metal trade and is not making full use of its powers in relation to the trade. The commission identifies some good practice within the authority, particularly its commitment to the Alliance to Reduce Crime Against Heritage (ARCH) memorandum of understanding, and identifies a number of areas where the council and its partners could work better together to reduce metal theft.

The commission's work was undertaken as the Scrap Metal Dealers Act 2013 was being considered by Parliament. The Act is the first major reform to the scrap metal trade in 48 years. The commission welcomes the strengthened powers provided in the new legislation but does not consider it to be a panacea. Instead, the commission recommends that in the period prior to the new Act's commencement, and beyond, the council and its partners implement a partnership action plan to tackle the issue in a holistic manner.

The report concludes that, whilst there is significant work that could be done within Lambeth, it is unlikely to have a significant impact unless similar work is replicated by the borough's neighbours. The commission therefore recommends that the Cabinet Member works closely with the council's partners and neighbours to develop and enforce a voluntary code of conduct for the scrap metal trade with a view to this being adopted pan-London once its sub-regional success can be demonstrated.

List of Recommendations

(A) That Lambeth exercises its responsibilities as London's first ARCH borough in recognising heritage crime, including metal theft, as a priority for the borough

(i) That as a signatory to the ARCH Memorandum of Understanding the council appoint a councillor to act as a Heritage Champion

(ii) That the council identify a single point of contact for metal theft of sufficient seniority to direct officers and take a strategic approach

(B) That the Cabinet Member for Public Protection, in partnership with the council, Lambeth Police and Operation Ferrous, lead on the development and implementation of a voluntary code of conduct for scrap metal dealers and motor salvage operators in the borough based on the best practice identified in this report

(C) That following development of a draft code of conduct the Cabinet Member for Public Protection, supported by the Chair of the Commission, lead on negotiations with Lambeth's neighbouring boroughs to secure commitment to implementing the code across the sub-region, lay the foundations for future partnership work against metal theft and demonstrate to the rest of London that by working together metal theft can be driven out of our area

(D) That the Safer Lambeth Partnership, and relevant constituent partners, adopt with immediate effect the Lambeth Metal Theft Scrutiny Commission Partnership Action Plan (Appendix C) and implement actions accordingly

(i) That progress against the plan's key milestones be reported back to Environment & Community Safety Scrutiny Sub-Committee

(E) That reassurance be sought from the Borough Commander that Lambeth Police are fully committed to tackling metal theft ,resourcing it accordingly and that specific consideration be given to the following

(i) That confirmation be provided of who the single point of contact for metal theft is in Lambeth Police and assurance given that they are of senior rank

(ii) That consideration be given to equipping all officers with portable ultra-violet lights to enable them to immediately identify property marking such as SmartWater

(F) That the Safer Lambeth Partnership make clear to residents what number they should call if they witness suspicious activity

(G) That partnership working with the full range of those operating in the policy area be improved specifically:

(i) Links between the council and the British Transport Police 'fusion units' to ensure information, particularly red-flags on specific scrap metal dealers, is shared

(ii) Links with the Environment Agency, British Telecom and neighbouring authorities to ensure an accurate picture of the number of dealers in and around the borough and to explore undertaking joint action

(iii) Links with British Telecom's public relations team to identify opportunities for a shared communications campaign

(iv) Opportunities for joint training between the Police, council officers and partners so that each are aware of each others issues and powers

(v) Opportunities for the Police and council officers to undertake joint operations such as Operation Cubo and the Metal Theft Days of Action

(H) That Lambeth's housing client team ensure an urgent audit is undertaken of the presence of dry-riser valves at the borough's communal housing blocks and consider introducing warning signs and security at dry-riser locations (see timescales in action plan (Appendix C))

(I) That the council report back to Environment and Community Safety Scrutiny Sub-Committee on how it disposes of its own scrap metal to ensure that the value is returned to the council

(J) That all outstanding recommendations relating to council-owned or leased buildings from the council's insurers be implemented immediately

Chair's Foreword and Introduction

My curiosity into metal theft arose following a spate of metal theft in Lambeth. Lambeth citizens have experienced disruptions to rail services, interruptions to telecommunications, theft of lead and copper from the roofs of churches, schools, private and council buildings, the theft of street signs, gully and manhole covers, and, most reprehensible, theft from war and grave memorials. We felt that criminals were endangering our heritage and councillors were not about to sit back and let that happen.

During the course of the commission members sought advice from the police, local scrap metal-dealers, local churches, British Telecom, Network Rail, community groups and individual residents. Whilst it was clear that agencies worked very hard to tackle metal theft in their own industries or areas, the commission was struck by the lack of a coordinated approach to metal theft. We have sought to address this recommending a more strategic approach to the prevention, investigation, enforcement and prosecution of metal theft. We want to ensure that the council, our neighbours and partners share expertise and resources and work smarter together. In addition the commission strongly believed that the community could play a pivotal role in the prevention and detection of metal theft. They are in effect the eyes and ears of the council and should be positively encouraged to look out for and report suspicious behaviour that might be related to metal theft.

While the commission welcomed the introduction of a licensing regime for scrap metal dealers in the Scrap Metal Dealers Act 2013 we felt that reliance on the Act alone was not enough to deter metal theft in the borough. Robust policy changes and initiatives at a local level are needed to continue the recent decline in metal theft.

I would like to give my thanks to the members of the commission for their time and genuine commitment to the task of tackling metal theft in the borough. We are grateful to all those who gave their time to our work but are especially indebted to Nicole Terrieux and Kristian Aspinall in the Community Safety Team and PC Rob Harrison for their support in the development of the partnership action plan that will be the driving force for change. I would also like to thank Tom Barrett, Scrutiny Manager, for his invaluable input and for coordinating our approach to what we discovered was a very complex issue.

Cllr Jennifer Brathwaite (March 2013)

Legislative position and responsibilities

1. The commission began its work by identifying the wide range of legislative powers that can already be applied to the issue of metal theft. The Scrap Metal Dealers Act 1964 is the main existing piece of legislation that regulates scrap metal dealers. It requires the council to issue licences to scrap metal dealers and, to maintain a register of persons operating in the borough as scrap metal dealers. Once registered with a local authority dealers must maintain records giving the following information:
    - a description of the scrap metal and its weight;
    - the date and time it was received;
    - the full name and address of the person from whom it was received;
    - the price payable for it or its value;
    - if the scrap metal was delivered by vehicle, the registration number of that vehicle;
    - the date the scrap metal was processed or dispatched;
    - the full name and address of the person to whom the scrap metal was sold or exchanged and the price;
    - if the scrap metal is disposed of otherwise than by sale or exchange, its value immediately before its disposal or processing[1]

2. In Lambeth dealers apply to register through completing a form, there is no fee payable and the council is unable to refuse registration nor can it impose any operating conditions.
3. The Scrap Metal Dealers Act 1964 was amended in early 2012 by the Legal Aid, Sentencing and Punishment of Offenders (LASPO) Act 2012. LASPO increased the maximum level of fines available for offences under the 1964 Act, made trading in cash illegal for non-itinerant dealers and introduced new powers for the police to enter premises. The provisions relating to cashless trading were enacted in December 2012.
4. As demonstrated in Table 1 there are a range of regulatory provisions that are applicable to the scrap metal trade including those related to waste transfer, transporting waste, burning cable insulation and requiring planning permission for scrap metal yards. The Environment Agency has national responsibility for regulation and enforcement of the 'waste' element including responsibility for permitting sites, licensing waste transportation and other hazardous waste

[1] LB Lambeth Public Realm Division (30 July 2012)

systems. In addition to the regulatory framework there is also the criminal framework relating to handling stolen goods and motor salvage regulations. With regard to the Scrap Metal Dealers Act 1964 the general consensus was that the Act was well past its sell by date.

- **Scrap Metal Dealers Act 1964** (registration with local authority and requirements on SMDs re keeping records)
- **Theft Act 1968** (handling stolen goods)
- **Control of Pollution (Amendment) Act 1989** (makes it a criminal offence to transport waste without being a registered Waste Carrier with the Environment Agency)
- **Environmental Protection Act 1990** (Scrap Metal Dealers required to have a permit to operate from Environment. Agency)
- **Town and Country Planning Act 1990** (requires Scrap Metal yards to have planning permission)
- **Clean Air Act 1993** (makes it a criminal offence to burn insulation from cables with a view to recovering metal- often an indication of an illegal scrap yard)
- **Vehicle Crimes Act 2001** (Motor Salvage Operators Regs 2002 requires motor salvage operators to register with the local authority and keep appropriate records)
- **Legal Aid, Sentencing and Punishment of Offenders Act 2012** (increase fines in SMD'64; ban on cashless trading (not itinerants); police powers of entry to Scrap Metal Dealers)

Table 1: Legislation applicable to the scrap metal trade or metal theft

5. As the commission began its work the Scrap Metal Dealers Bill, a Private Members Bill taken up by Richard Ottaway MP (Croydon South), began its journey through Parliament. As the commission finished its report the Bill completed its journey through parliament successfully and was awaiting enactment. The new legislation repeals and replaces the 1964 Act with one that will 'empower local authorities with a more robust and enforceable licence regime for all those who deal and collect scrap metal'[2]. Key elements of the new legislation are as follows:

    - No person can carry on business as a scrap metal dealer without a scrap metal licence
    - The scrap metal licence is to be issued by the local authority
    - The local authority must not issue or renew a license if it is not satisfied that the applicant is a suitable person to operate a scrap metal business
    - A local authority will have the power to close down scrap metal yards operating without a license

[2] House of Commons Library (2012)

- Where an applicant, licensee or manager has a criminal record relevant to metal dealing the local authority may impose conditions upon or vary the license so as to restrict trade
- It will be an offence to receive metal from a person without first verifying that person's identity
- Dealers will be required to keep records for each sale and disposal for a period of three years
- The extension of cashless trading to itinerant dealers[3]: it will be an offence for a scrap metal dealer to pay for metal received other than by cheque or an electronic transfer
- The introduction of a national public register of all Scrap Metal Dealers kept by the Environment Agency
- The local authority has the power to revoke licences in certain circumstances
- Local authorities and the police will have new powers to enter and inspect premises carrying on scrap metal business
- The Act specifically widens the definition of Scrap Metal Dealers to include Motor Salvage Operators

6. As part of its work the commission submitted its views on the (then) draft legislation to the Public Bill Committee (House of Commons). This submission is set out in Appendix A to this report. Whilst the commission welcomes the main provisions of the soon-to-be Act councillors felt that the inability to impose local conditions on a licence was a significant omission. However, the commission's lobbying on this point proved unsuccessful, save for the provision that the Act would be reviewed within five years to ensure that it had met its objectives. The commission felt that despite the numerous current and proposed legislations relating to with metal trade and theft, the council, as an enforcement agency, needed to be in a position to apply current and new legislative powers and responsibilities if Lambeth is to effectively tackle metal theft in the borough. The commission recognises that there is the issue of manpower and resources that needs to be addressed.
7. In the course of its work the commission was repeatedly reminded that successfully tackling metal theft required a response from beyond just those with legislative or regulatory powers. As such the commission considered

[3] An itinerant dealer is a person who runs a scrap mental business other than from a site, he will collect waste material from door to door

evidence and information from British Telecom, English Heritage, the Ecclesiastical Insurance Group, local churches, the Friends of West Norwood Cemetery, and a local scrap metal dealer. The commission also attended a conference organised by the Local Government Association that included speakers from the Energy Networks Association, the Institute of Materials, Minerals and Mining, the Environment Agency, the British Metals Recycling Association (the trade association for scrap metal dealers) and a number of local authorities exhibiting best-practice in the area. Examples of work that each are undertaking are included in the Past, Current and Future Activity section of this report.

What we know about metal theft

The national picture

8. Estimates of the total social and economic cost of metal theft to the UK vary. The most recent studies estimate it at £220m per year (Home Office, 2011), between £220m-260m per year (Deloitte, 2011) and £777m per year (Association of Chief Police Officers, 2010)[4]. The LGA's *Metal Theft Toolkit* records that in 2011, '15,000 tonnes of metal were stolen, of which 7,500 tonnes came from railways, statues and church roofs. The cost of the thefts to the railways alone amounted to £13 million, with many more millions lost as a result of delays to passengers'[5]. Nationally metal theft frequency is decreasing with both the Met and the British Transport Police (BTP) recording year-on-year decreases. Despite this 2011 was the worst year on record for the Ecclesiastical Insurance Group who recorded over 2,500 metal theft related claims during the period.
9. The commission was provided with evidence from both the Police and the Ecclesiastical Insurance Group that metal theft was closely linked to commodity prices (see Figure 1). Those prices were closely linked to global industrial growth, particularly by the two largest consumers of copper; China and the US[6]. The slow-down in the global economy resulted in falls in the price of copper during 2012[7] and it was suggested to the commission that this may be one of the reasons for the decrease in metal theft during the last couple of years. Although the worldwide prices of scrap metal have recently fallen in

[4] Home Office (2012)
[5] Local Government Association (2012), p5
[6] Bloomberg (2013)
[7] Financial Times (2013)

recent years, it is generally believed that prices will stay at elevated levels for some time. So the problem of metal theft is not going away.

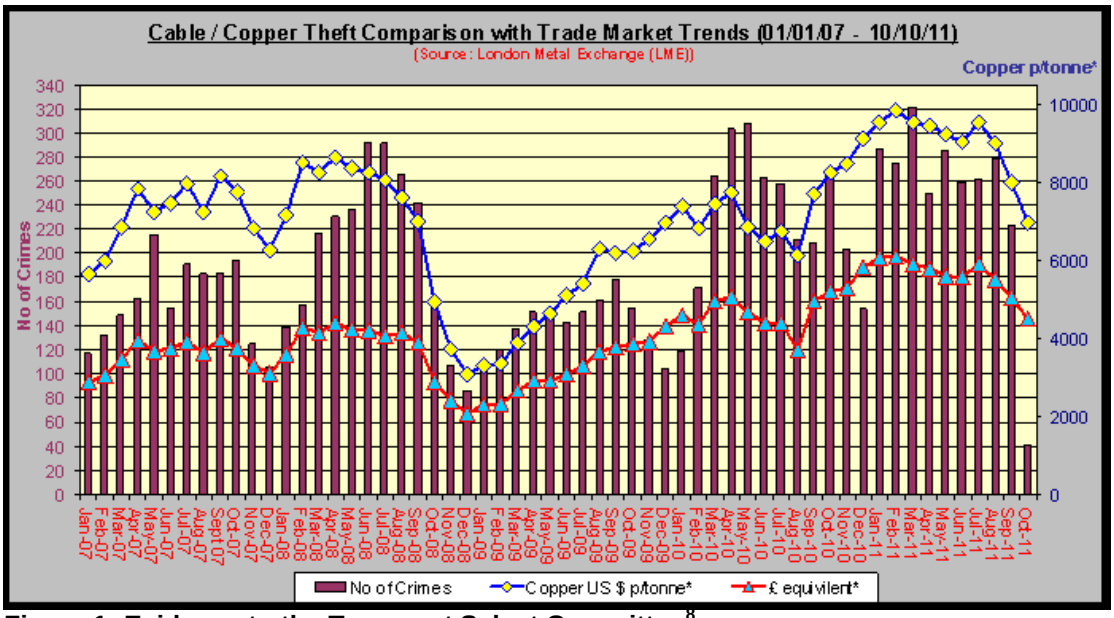

Figure 1: Evidence to the Transport Select Committee[8]:

10. In terms of impact National Rail estimated that in 2010/11 3.8m passenger journeys were delayed or cancelled as a result of cable theft, causing 360,000 delay minutes and resulting in £16.5m compensation payments to train operators[9]. Simon Davies, General Manager for Cable and Payphone Crime, British Telecom (BT) explained to the commission that metal theft was costing BT millions of pounds and taking up thousands of man hours every year. Single cuts to BT cable could result in thousands of people being without telephone or broadband services and in the most extreme cases result in complete community isolation (as had happened on the Isle of Skye). The commission noted that whilst being regular victims of metal theft Network Rail were also the largest contributor to the legitimate UK scrap metal industry. Local authorities were the third largest contributor[10]

11. In March 2012 the Environment Agency had permitted 831 scrap metal sites nationally, were aware of 317 active illegal sites and had stopped 190 illegal sites from operating. However, the commission learned that estimates by BT of the number of sites far exceeded those of both the Environment Agency and records kept by local authorities.

[8] House of Commons Transport Committee (2010-12)
[9] House of Commons Transport Committee (2012)
[10] British Metals Recycling Association (2012)

London

12. The Metropolitan Police's pan London Operational Co-ordinator for Metal Theft Acting Inspector James Coomber, informed the commission that the national correlation between the number of crimes and commodity prices was repeated at a regional level. Looking at the London region as a whole it is the outer North East and South East boroughs that have the highest volume of metal theft crime. Croydon was known to have over 50 itinerant dealers registered and had experienced the highest number of incidents of metal theft in both 2011 and 2012. Acting Inspector Coomber informed the commission that there was also a clear correlation between the number of scrap metal dealers and the number of metal theft crimes in an area[11].

13. In London the Metropolitan Police was reporting a 30% decline in metal theft incidents in 2012 and British Transport Police (BTP) had also recorded year-on-year declines (see Table 2 below). However both BTP and the Met cautioned that this was a result of both increased police activity and a reduction in commodity prices. The British Metals Recycling Association had predicted that the price of copper would increase from its slump in 2012 and in their evidence to the commission English Heritage warned that, despite a drop in metal theft last year, they were concerned that an increase in commodities prices or a decrease in police focus on the issue would spark a resurgence in metal theft.

	Live			Non-live		
	2010/11	2011/12	2012 - Oct	2010/11	2011/12	2012 - Oct
London North	102	142		184	172	
London South	114	64	33	203	165	60
London Underground	22	42		99	64	
Total	238	248		486	401	

Table 2: Number of crimes of live and redundant cable from BTP areas[12][13]

[11] This correlation has also been identified by researchers in America. See: Sidebottom (2012)
[12] British Transport Police (2012a) and LB Lambeth Metal Theft Commission (October 2012)
[13] It should be noted that the BTP London South area stretches from Kent to Devon as well as South London.

Lambeth

14. The commission received detailed information from the Metropolitan Police relating to the prevalence and value of metal theft in Lambeth (see Table 3). In 2011 there were 168 incidents with metal worth £206k stolen and by September 2012 there had been 85 incidents with metal worth £122k stolen. Figures did not exist prior to 2011 as the Met had only recently begun tracking metal theft as a specific crime (previously it had been recorded under 'theft').

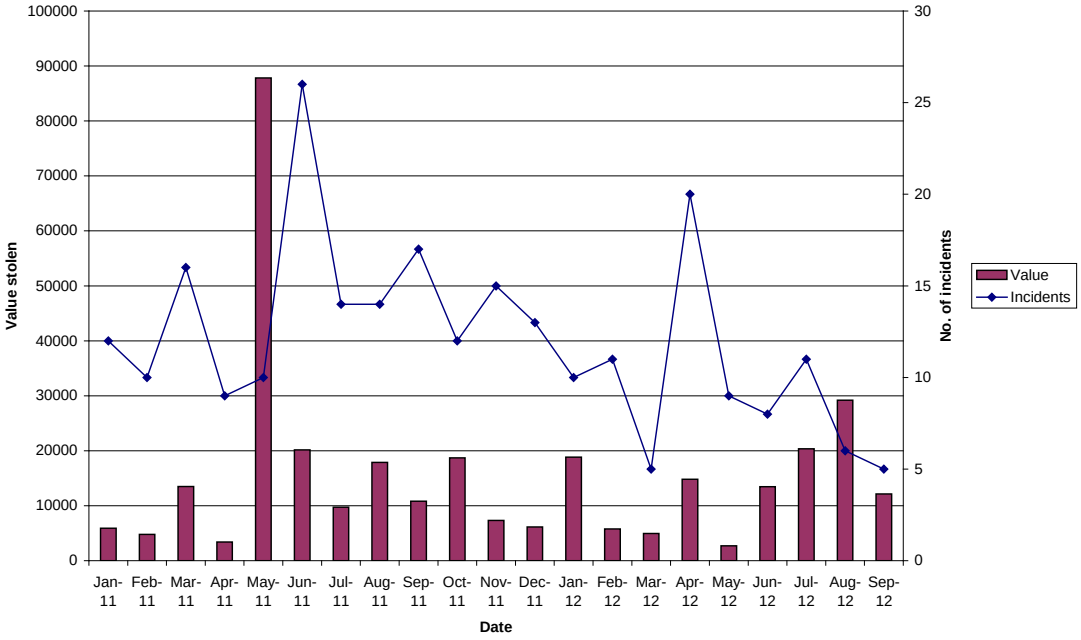

Table 3: Value and Number of incidents of Metal Theft in Lambeth Jan 2011-Sept 2012[14]

15. In comparison to Croydon, Southwark and Lewisham, Lambeth suffers less from metal theft. However, as was highlighted by Cllr Jack Hopkins, Lambeth's Cabinet Member for Public Protection in his session with the commission, despite being low volume and generally small scale crimes the impact of metal theft was high (see case studies). The volume and type of thefts from authorities neighbouring Lambeth was also cause for concern to the commission. Southwark particularly had suffered a number of high profile thefts of public art (notably the Barbara Hepworth sculpture from Dulwich Park and a statue dedicated to Alfred Salter MP[15]) whilst the spate of thefts in Richard Ottaway's Croydon South constituency, including church roofs and war memorials, led to his introduction of the Scrap Metal Dealers Bill. Members of

[14] Coomber (2012)
[15] Southwark (2012)

Case study: St Peter's Church – Leigham Court Road, Streatham , St Leonards ward

St Peter's Church is a Grade II* listed building. It was built in two main stages in 1870 and the mid-1880s. New vestries (with flat roofs) were added in the early 1900s. Lead thefts from the church started in the summer of 2008. There have been 6 lead thefts since then, the last was in January 2012.

All of the lead thefts have been done to areas which can be accessed by climbing up drain pipes or lightening conductor tape. None of the thefts have involved ladders. On one occasion there was evidence that they used the church's tools and the church's wheel barrow to assist the theft.

Since 2008 the Church introduced a range of additional security measures including the use of SmartWater, anti-climb-paint and new railings (for which it had taken 6-months to get the necessary planning permission from the council despite the urgency of the matter).

In March 2012 St Peter's were able to access seed-funding from the Ecclesiastical Insurance Group to pay for the fitting of an alarm-system. Since then the Church had not experienced any thefts.

In the course of discussion with the commission the Clerk of Works at St Peter's indicated that some success had also been experienced through contacting the Church's neighbours to increase there awareness that thefts had taken place. Since doing so the Police had been called on a number of occasions when suspicious activity had been spotted. The Clerk of Works also indicated that the Church had been disappointed at the lack of advice on protecting themselves provided by the Police, though that provided by the Ecclesiastical Insurance Group had been excellent.

the commission were also pleased to learn that colleagues in Wandsworth were taking the issue seriously.

16. The commission was also conscious of the borough's geography, that it was long and thin, and the major roads that ran through it, particularly the A23. This meant that it was easy for Lambeth itinerant dealers to travel outside of the borough and for non-Lambeth itinerant dealers to travel into, across and through the borough. This placed a greater emphasis on the importance of joint number plate recognition activities with the Police (see reference to Operation Cubo later in this report). Furthermore it made the commission aware that if metal is collected locally it is unlikely, due to our geography, to be processed locally thus making a joint approach with neighbouring authorities more important.

17. Given the link between crime volume and number of scrap metal dealers it is perhaps not surprising that Lambeth only has 12 scrap metal dealers registered in the borough. Of these four are physical scrap metal yards and the remaining eight are itinerant traders[16]. This compares to fifty-plus itinerant traders in Croydon. Please review Appendix B for a list of the Scrap Metal Dealers operating in Lambeth.
18. However, the commission had cause to question the accuracy of the council's register. The commission were provided with a restricted profile of scrap metal merchants and metal theft in the borough prepared by Lambeth Police in August 2011. That document included a list of 8 scrap metal dealers in or on the borders of Lambeth. None of those appearing on the Police's list were registered on the Council's list and vice versa. Furthermore, in his evidence to the commission, the Council's Licensing Manager indicated that he had become aware of four un-registered scrap metal dealers as a result of health and safety audits undertaken by other parts of the Environmental Health Team. As a result, letters have been sent to each of the four unregistered dealers insisting that they register. However, the discrepancies between the information held suggests that there can be little certainty that either the Police or local authority have an authoritative record of Scrap Metal Dealers operating in Lambeth. It also suggests a lack of information sharing between the council and the Police.
19. The commission was also conscious of the relevance of motor salvage operators (MSOs) in relation to the scrap metal trade. The council is required to register MSOs and the powers available to it are stronger than those for registering scrap metal dealers (for example registration can be refused). However, there is only one registered operator in the borough. Given the apparent inaccuracies in the register of scrap metal dealers the commission thought it very likely that the register for MSOs was out of date and did not reflect the number of MSOs actually working in the borough.
20. The commission was provided with detailed information relating to the location of council-owned buildings that had been the subject of metal theft. Prior to 2007 there had been no insurance claims relating to metal theft but since then there had been 56, more than half of which related to either Libraries (16) or Schools (13). The total value of claims was close to £207,000[17]. The

[16] LB Lambeth (September 2012)
[17] This figure does not reflect the damage caused to West Norwood Library and Nettlefold Halls. See separate Case Study

commission noted that the council's buildings, as is common practice for local authorities, are insured for catastrophe cover only with an excess of £500,000. As such the £207,000 figure was, or is to be, met entirely from council funds via a reserve set-aside for insurance claims. In addition to council-owned buildings the commission also received the following information from the Council's Public Realm Division:

Description	Total Cost (£)	No of instances				
		08-09	09-10	10-11	11-12	Total;
Time Plates (Parking/Disabled Bays)	7,680	48	0	10	0	58
Metal Bollards / Cast Iron Bollards	17,434	22	21	3	6	52
Signs (Parking and Direction)	6,930	9	2	25	1	37
Posts (street name plates/Signs)	9,499	16	7	7	1	31
Frames (Gully/Manhole cover)	25,230	19	38	15	2	74
Street Name Plates	29,912	43	60	5	16	123
Guard Rails	676	4	0	0	0	4
Total	97,361	161	128	65	26	379

Table 4: Theft of un-insured Public Realm assets

21. Whilst this too shows a declining trend the prevalence, total value and level of risk presented to the public from the loss of, for example, 80 gully or manhole covers was a shock to the commission. Members were pleased to note that a number of steps are being taken to reduce exposure to metal theft including fitting plastic parking signs, fixing road name plates out of reach and not replacing bollards as part of street de-cluttering. These steps may go some way in explaining the decline in theft of non-insured assets in the borough.

What we know about the crime and the criminals

22. Deputy Chief Constable Paul Crowther (British Transport Police and Association of Chief Police Officers lead on metal theft) characterised metal theft as similar to the illegal drugs market in reverse: small packages are stolen which are then bundled and exported. DCC Crowther highlighted that the risk-reward ratio was in favour of criminals; the average fine in 2010 was £369. The relatively small fines also acted as a disincentive to pursue prosecution[18].

[18] Crowther (2012)

However, DCC Crowther felt that the removal of limits on fines for the most serious offences and introduction of cashless trading in the LASPO Act would go some way to addressing these problems. The commission agreed that the removal of an upper limit in financial penalties for the most serious offences represented a significant increase in the powers of the Magistrate court. We nevertheless felt that in practice, given the past level of fines, the removal of the upper limit on fines may not translate into magistrates imposing higher fines unless Lambeth together with the prosecuting authority, took a more robust approach to all cases of metal theft. For example, to persuade the magistrate to look beyond the value of the material stolen when deciding the level of fines, impact statements[19] by Lambeth officers should be submitted to highlight other consequences of metal theft in addition to the financial impact.

23. The majority of metal theft in Lambeth was opportunistic[20] with only a small percentage of crimes being large scale. This reflected two different types of criminality: the opportunist and the organised criminal. Of the 88 offences in Lambeth recorded in the six months prior to August 2011 39 related to copper theft and 32 to lead. The remaining types of metal were only in single figures (e.g. cabling, brass and steel).

Past, current and future activity

24. In February 2012 the LGA surveyed English and Welsh councils to ascertain if they had been affected by metal theft since April 2009. 70% of the authorities that responded had been affected with 18% reporting that they had suffered major consequences as a result. 39% of those surveyed had prosecuted thieves and/or scrap metal dealers. Mark Norris, Senior Adviser on policing, community safety and re-offending policy for the LGA, informed the commission that the broad conclusion of the survey was that many authorities were affected, but fewer had been doing anything about it at the time of the survey. The commission was therefore interested in what Lambeth had done, was doing and planned to do to address the issue.

The council

25. The two parts of the council with the greatest responsibility for tackling metal theft were the Public Realm Division, part of the Housing, Regeneration and

[19] See para 47
[20] Harrison (2011)

Environment Department and the Community Safety Team, part of the Culture and Communities Division of the Adult and Community Services Department. The commission interviewed officers from both areas.

26. The Public Realm Division is responsible for a wide range of services relating to the maintenance and development of the public environment including: consumer protection (licensing and trading standards) street care and management. The Division is responsible for registering scrap metal dealers in accordance with the Scrap Metal Dealers Act 1964. In its sessions with the commission it was revealed that no enforcement activity (such as checking to ensure that the requirements of registration were being met (e.g. keeping records)) had been undertaken by the Division beyond fulfilling the legislative requirement to register dealers. Officers explained that this was because there was no funding for registration and therefore no capacity to undertake such work. In addition officers felt that there was insufficient call for a proactive approach and inadequate legislative powers should they do so. As a result the department did not have an established relationship with those Scrap Metal Dealers they had registered.

27. Public Realm officers were aware of the changes brought in by the LASPO Act and the proposals in the Scrap Metal Dealers Bill (soon-to-be Act) but did not propose to take any action until those pieces of legislation were in place. The impression given to the commission was that, once funding was attached to a licensing regime (as per the new Scrap Metal Dealers legislation), the department would be able to engage more proactively with local scrap metal dealers. Officers estimated that £4-500 was the likely indicative cost per licence issued and would be sufficient to fund a single enforcement visit per year. The frequency of enforcement visits was likely to be in line with the perceived risk of each dealer.

28. Officers indicated that there was occasional communication with the police relating to whether or not businesses were registered. However, the department did not share information (for example on itinerant traders) with neighbouring authorities and there appeared to be a lack of communication between the relevant council departments. For example there was no mechanism by which trading standards would be notified when the roof from West Norwood Library was stolen so that, for example, an alert could be sent to local dealers[21]. Members of the commission were also concerned at the

[21] LB Lambeth (September 2012)

apparent incompleteness of the council's register and that it appeared that it was only by chance that the Licensing Manager had become aware of the additional four dealers that had undertaken health and safety audits within the same Division.

29. Overall the commission was disappointed that the Division were not taking a more proactive approach to the issue. In particular they felt that there had been a failure to create downward pressure on the local scrap metal industry through proper enforcement of the range of legislation available to them (particularly the Scrap Metal Dealers Act 1964 and environmental protection powers) and a lack of coordination with the likes of the Police or Environment Agency. This perception was also reflected in the Division's approach to the new Scrap Metal Dealers legislation. The commission felt that officers were treating the Scrap Metal Dealers Bill as a panacea when in fact tackling the problem was a far wider issue requiring a range of approaches. Given the link between levels of theft and the number of dealers it was quite clear to the commission that one of the most important first steps the Division needed to take was getting a clear idea of the number of scrap metal dealers in the borough and establishing an ongoing relationship with them.

30. Some of the concerns that the commission had regarding closer working between council departments were addressed in discussion with Adrian Smith, Divisional Director, Culture and Communities and the officer with overall responsibility for the council's Community Safety Team. Mr Smith indicated that the council was moving away from separate functions towards a more integrated model of enforcement under the banner of 'community safeguarding'. The commission were informed that the model would go some way to getting the multiple enforcement specialisms (community safety, environmental crime, licensing, noise, trading standards, foods, health and safety) sharing resources and intelligence and working better together.

31. The Community Safety Team informed the commission that metal theft had not been identified as a priority issue in the Safer Lambeth Partnership's[22] annual strategic assessment. Despite this, in partnership with Lambeth Police and in discussion with the commission the Team drafted a multi-agency action plan on

[22] The Safer Lambeth Partnership is Lambeth's statutory community safety partnership, responsible for delivering Lambeth's Community Safety Strategy. It is chaired jointly by the Borough Commander, Lambeth Police and LB Lambeth's Chief Executive. Representatives of the local NHS, Probation, Prison and Fire services sit on the SLP along with representatives of the Community Police Consultative Group and a range of voluntary and community organisations.

metal theft. The commission was grateful to the Community Safety Team for pausing the development of the action plan whilst the commission completed its work. This enabled the commission to take ownership of the action plan, ensure its findings are fully reflected within it and is an excellent example of collaborative working between officers and a Scrutiny Commission. The plan is appended at Appendix C.

Recommendation:	That the Safer Lambeth Partnership, and relevant constituent partners, adopt with immediate effect the Lambeth Metal Theft Scrutiny Commission Partnership Action Plan (Appendix C) and implement actions accordingly (P1/T3)

32. The plan focuses on four areas: Intelligence; Protection and prevention; Enforcement action; Communications and addresses the operational concerns that arose in the course of the commission's work. These include identifying and protecting at-risk assets (council, partner and community); creating a master list of scrap metal dealers and establishing a relationship with dealers; establishing an ongoing enforcement regime and steps to build awareness of metal theft. The commission was impressed at the commitment shown to tackling the issue by the officers (Police and Lambeth) that engaged the commission on the plan's development.
33. However, some concerns remained. It appeared that commitment to the issue was driven by the efforts of a few, relatively junior police and council officers. Whilst this was to be welcomed the commission felt that this left maintaining focus on the issue vulnerable to key staff leaving. Indeed, during the commission's work both of the lead Police officers, one a PC and the other a Sergeant were moved to other duties. Furthermore question marks remained regarding levels of commitment to full implementation of the action plan by the relevant parts of the partnership and therefore delivery of the outcomes identified. The commission was keen to see the momentum that had been established by the development of the action plan maintained within the partnership. Key to this appeared to be establishing single points of contact within both Lambeth Police and the council with a commitment to the issue, the seniority to direct officers and ability take a strategic approach to the issue.

Recommendation:	That the council identify a single point of contact for metal theft of sufficient seniority to direct officers and take a strategic approach
Recommendation:	Confirmation be provided of who the single point of contact for metal theft is in Lambeth Police and assurance given that they are of senior rank

34. In its session with the Community Safety Team and Cabinet Member for Public Protection the commission learned of a number of welcome steps that were being taken in relation to protecting Lambeth's 2500 heritage assets (e.g. churches, public art, war memorials). As the commission's work progressed Lambeth became the first London Borough (shortly followed by our neighbours in Wandsworth) to join English Heritage's Alliance to Reduce Crime Against

Alliance to Reduce Crime Against Heritage – memorandum of understanding

A**s a signatory to the ARCH memorandum of understanding (MoU) Lambeth has committed to the following responsibilities:**

- **An annual strategic assessment for heritage crime which informs an action plan for the parties (the council, English Heritage, ACPO and the CPS) to the MoU to follow.**
- **Development plans take account of the historic environment.**
- **Exercise functions as a local planning authority in relation to listed buildings, conservation areas and scheduled monuments.**
- **Strategies to tackle crime and disorder including anti-social behaviour to include the historic environment and associated heritage assets.**
- **Assist MoU partners where practicable and wherever resources and powers allow, in the prevention, investigation, enforcement and prosecution of heritage crime.**
- **work closely to develop and adopt good practice in the sharing of personal and non personal information with other signatories.**
- **recognise that the sharing of knowledge and working practices is beneficial in tackling heritage crime.**
- **Assist and advise in any campaigns of prevention and, where expertise is needed and resources allow, in the investigation and prosecution of any crimes.**

Heritage (ARCH). ARCH is a voluntary national network of stakeholders with an interest in preventing crime that causes damage to or interferes with the enjoyment of heritage assets in England. In addition to ARCH membership Lambeth also became the first London Borough to sign the ARCH memorandum of understanding for enforcement agencies (see box). The commission welcomed Lambeth's membership of ARCH, particularly the commitment that this gave to prioritising heritage crime, including metal theft, and was eager for the council to demonstrate how it was exercising its responsibilities as a member. This was especially the case in relation to war memorials, the commission was conscious that the 100year anniversary of the beginning of the Great War was approaching in 2014, and West Norwood Cemetery which had been subjected to a number of thefts and provided evidence to the commission. The commission felt that identifying a Heritage Champion from members of the Council would help give the issue sufficient weight and also that ARCH membership appeared to represent an excellent opportunity to work together with the council's neighbours and fellow-signatory in Wandsworth.

Recommendation:	That Lambeth exercises its responsibilities as London's first ARCH borough in recognising heritage crime, including metal theft, as a priority for the borough (P1/T3) (i) That as a signatory to the ARCH Memorandum of Understanding the council appoint a councillor to act as a Heritage Champion (P1/T3)

35. Alongside ARCH membership the Cabinet Member for Public Protection informed the commission that he was establishing an *Urban Heritage Watch* (UHW). The purpose of UHW was to provide a mechanism by which members of the community could help protect the borough's heritage assets by taking an active role in monitoring sites, reporting suspicious activity and sharing intelligence. As well as 'friends groups' the scheme would also be targeted at those who run businesses overlooking heritage sites, for example shop-keepers. Such an approach was welcomed by the Commission, not least because it reflected some of the good practice that had been identified at St

Peter's Church (see case study) and by both the Ecclesiastical Insurance Group and English Heritage who emphasised the importance of intelligence about and subsequent risk-rating of assets.

36. It was inconceivable to the commission that many of the metal thefts that took place in the borough had not been witnessed by members of the public. However, as councillors learned, it was not uncommon for thieves to disguise themselves as legitimate workers (for example dressed in BT overalls/using BT vans). The commission therefore questioned whether the council and/or Police should engage in a broader awareness-raising campaign, similar to that which had been undertaken in Bexley (see Appendix D). Given the existing level of communications 'noise' arising from other borough-wide campaigns the Cabinet Member and Community Safety Officers felt that such a campaign risked being expensive, ineffective and not in proportion to the scale of the issue. Rather they preferred taking a targeted approach as proposed in the Urban Heritage Watch scheme and working with the likes of BT and Safer Neighbourhood Teams to raise awareness of legitimate works that were taking place. Despite this, members of the commission felt that some improvement needed to be made to make clear to the public what they should do if they witness some suspicious activity as it was clear that many considered calling 999 an over-reaction.

Recommendation:	That the Safer Lambeth Partnership make clear to residents what number they should call if they witness suspicious activity

37. Although Public Realm and Community Safety Team are the parts of the council with the greatest role in relation to metal theft the commission also discussed the topic with the Risk and Insurance Team (Finance & Resources Department) and received a brief paper from the Valuations and Asset Management Services Division (Housing, Regeneration and Environment Department). The latter note identified reactive work being undertaken to a number of heritage sites in the borough after they had suffered from metal theft or vandalism: West Norwood Library, Nettlefold Hall and West Norwood Crematorium Chapel, Brockwell Hall and Streatham Library.

38. Information provided by the Risk and Insurance Team highlighted that metal theft accounted for just 1.3% of total claims made by the council between 2007-12. For this reason management activity to date had been focussed on other

Case study: West Norwood Library and the Nettlefold Halls

Thefts of metal from West Norwood Library and the Nettlefold Halls appear to date back to at least 2008. In September 2010 the council's insurers, Zurich Municipal, conducted a risk management report of the site. This highlighted the vulnerability of the building's copper roof and recommended that further protection was put in place to restrict access as a priority and within three months. No such measures were put in place. Between 12 March and 14 June 2011 further thefts of the copper roof at West Norwood Library and the Nettlefold Halls were recorded on 8 separate occasions and on 6 June 2011 the Library and Halls were closed due to extensive flooding and water damage. The council's Risk and Insurance Team highlighted that these thefts exacerbated existing problems of water ingress into a building which was already in need of repairs and maintenance works. As such the costs incurred as a result of the water ingress have only been partially met through the insurance claims. The Library and Halls were not re-opened and at the time of writing redevelopment plans were being put in place for the site. In the meantime the Library re-located temporarily to the Lambeth Resource Centre, before subsequently moving to the Old Library site due to low usage of the LRC.

No full appraisal of the financial cost to the council of the closure and re-location of the library has been undertaken. However, the commission was able to identify the following direct costs:

Cost	Value (£)
2008-11 Insurance claims	-29,000
2011 Making safe	-10,000
Temporary Roof	-187,000
Loss of income (p/a)	-40,000
Total	-266,000

Whilst it is clear that the cost to the council of these incidences of metal theft are well in excess of £¼m the commission was also aware of the significant impact that closure of the Library and Halls had on the community. In addition to the various events hosted by the library in 2010-11 the Nettlefold hosted 682 events and activities open to the public and 60 private events.

Groups affected by the continued loss of this community resource include older people's groups, dance schools, fitness classes (including GP referral classes), student shows, homework classes, music shows, mental health groups and the local MP's advice sessions. The commission was informed that many of the groups that used the auditorium/theatre space in particular have moved out of the local area.

claim areas where the cost to the council is significantly higher[23]. However, there was evidence that where management activity had been undertaken the reports and recommendations of the Risk and Insurance Team were not necessarily adhered to. This was most notably the case with West Norwood Library and Nettlefold Hall where thefts of its copper roof has compounded a previous lack of investment in repairs and maintenance resulting in the continued closure of the site (see case study). The immeasurable cost to the community of loss of the resource and the (unmeasured) total financial costs incurred by the council as a result of these thefts far outstrip both the scrap value of the copper stolen and the costs of the preventative action that was recommended. Further investigation of the council's property risk management surveys revealed that there were 24 outstanding priority 1 recommendations (requiring action within between 1-3 months) from the council's insurers, some of which dated back to June 2009. It was not acceptable to the commission that the reports and recommendations of the council's insurers are not implemented as failure to do so exposes the council to unnecessary risk, potential cost and in the worst-case scenario loss of services to communities.

Recommendation:	That all outstanding recommendations relating to council-owned or leased buildings from the council's insurers be implemented immediately.

The Police

39. Across the UK the commission learned of considerable work being undertaken by the Police. Particularly notable was the success of Operation Tornado, a voluntary scheme developed in the North East by a partnership of the British Metals Recycling Association (BMRA), the Association of Chief Police Officers (ACPO), British Transport Police (BTP), the Home Office, and Northumbria, Durham and Cleveland Police. The scheme requires anyone selling scrap metal to participating dealers to provide photographic proof of identity and abstention from cash payments as two of a number of measures used to restrict the sale and movement of stolen metal. In the pilot areas Durham reported a 55% reduction in offences, Cleveland 55%, Northumbria around 40%, and BTP a 60% reduction[24]. The commission was informed that

[23] LB Lambeth Risk and Insurance Team (30 July 2012)
[24] British Transport Police (2012b)

Operation Tornado was due to be rolled out across the Met area but at the time of writing this had not taken place. The majority of the steps taken voluntarily under Tornado will become law once the Scrap Metal Dealer Bill 2013 is enacted but it was of particular note that Tornado's success took place without legislation. This demonstrated to the commission that it was not necessary to wait until new legislation was in place to take effective steps to restrict the trade in illegal scrap metal. Accordingly the commission puts its full weight behind proposals to roll Tornado, or a similar voluntary code out across London as soon as possible. At the very least the commission felt that such a move would enable the Police and local authority to identify higher-risk dealers.

Recommendation:	That the Cabinet Member for Public Protection, in partnership with the council, Lambeth Police and Operation Ferrous, lead on the development and implementation of a voluntary code of conduct for scrap metal dealers and motor salvage operators in the borough based on the best practice identified in this report

40. The commission was informed in October 2012 that in the previous twelve months there had been only two thefts on the railways in Lambeth, one in Tulse Hill and the other in Waterloo. In both cases members were pleased to hear that there had been arrests. In the same session members were informed that BTP, English Heritage, HM Revenue and Custom , BT and National Rail analysts worked together on 'fusion' units. They used red, amber, green (RAG) ratings to identify problematic scrap metal dealers and then worked to convert those rated as red to amber or green. However, where a red-risk dealer was identified the relevant local authority would not necessarily be notified. This felt to the commission like a further area where closer information-sharing could result in more effective partnership work, reduce duplication and create further downward pressure on the illegal trade.
41. The commission was surprised to learn that until mid-2012 the Crime Record Information System (CRIS) had not included specific classifications for metal theft; previously it had just been classified as theft. This had now changed with the introduction of two classifications; 'metal theft infrastructure' and 'metal theft non-infrastructure'. This increase in the profile of metal theft within the Police was also reflected in the Met's decision to take a more coordinated approach to

the issue in early 2012 through the introduction of Operation Ferrous, led by Acting Inspector James Coomber. Acting Inspector Coomber had previously worked in Bexley where he had led a number of Police and partnership teams that had been acknowledged as best practice in tackling metal theft. He outlined a number of steps that the Met was taking. These included working with heritage partners such as the Church and English Heritage, deploying officers in London-wide 'days of action' every quarter (surprise visits to scrap metal dealers and motor salvage yards) and compiling a web-based database (MARS) of scrap metal dealers.

42. As well as the 'days of action' A/I Coomber informed the commission of other Met-wide operations that the police undertook which closed the net on metal thieves. This included Operation Cubo, which utilises automatic number-plate recognition (ANPR) technology to identify vehicles used by criminals or uninsured drivers. The commission felt that both Cubo and Tornado represented a considerable opportunity for council officers (particularly those with relevant regulatory responsibilities) to undertake joint work with the local Police to bring the full weight of each organisation's regulatory and legal powers down on the illegal metal trade as well as an opportunity to establish a relationship with local scrap metal dealers. The commission noted that such joint operations were common in other local authority areas, including across the border in Wandsworth.

Heritage assets

43. The commission held information-gathering sessions with English Heritage, the Ecclesiastical Insurance Group (EIG), the Diocese of Southwark and those responsible for specific heritage assets in the borough (Friends of West Norwood Cemetery and St Peter's Church (see case study)). An experience repeated by a number of those responsible for heritage assets to the commission was that the response by the police had been slow and that they had not appeared particularly interested in the crime. Whilst there were positive reports of efforts by the local Crime Prevention Design Advisor, PC Rob Harrison, there appeared to be a disconnect between his understanding of the issues with those in the rest of the force.

44. In contrast, St Peter's Church indicated that the advice and support received from EIG had been excellent. EIG, in their session with the commission, indicated that the theft of metal from churches had been a significant problem

since 2007 resulting in the group imposing restrictions on their cover where churches were not taking a proactive approach to protecting themselves. It did not escape the commission's attention that St Luke's Church, the location for one of the commission's information-gathering sessions, had been the victim of metal theft when scaffolding had been erected. The Group's consultants and surveyors provide advice to churches and specific guidance is available on their website. Since 2008 the Group has been distributing free SmartWater kits to their policy-holders and they were confident that, when used with the relevant warning signs, SmartWater acted as a considerable deterrent. By November 2012 over 18,000 churches nationwide had registered with SmartWater and EIG had reported a 60% drop in lead thefts during the previous 12 months[25].

45. However, EIG were aware that SmartWater whilst a deterrent would not prevent all metal theft. However the 'deterrent factor' could be enhanced by wider usage of ultra violet lights (under which SmartWater shows up) by both the Police and scrap-metal dealers.

46. EIG had also recently launched a hands-off our church roofs campaign which provided further advice to churches and encouraged them to consider installing a suitable roof alarm. This was alongside a targeted approach to funding RDAS alarm systems for certain churches. The £3-6,000 cost of rolling out such systems to the 14,000 churches in England was prohibitive to EIG however, as can be seen in the St Peter's case study, one Lambeth Church had received seed funding for an alarm from EIG and this had brought theft at the site to a halt. EIG informed the commission that funding for alarm systems was provided on a targeted basis taking into account claims history, local knowledge and consultation with relevant personnel within each diocese. The free alarm-surveys were being provided as part of the 'hands off' campaign. The commission was also pleased that EIG's advice to churches included guidance on establishing churchwatch-type arrangements as had been so successful at St Peter's and was proposed by the council's Urban Heritage Watch scheme.

47. The commission also welcomed the considerable work that had been undertaken by English Heritage in relation to metal theft under the banner of its ARCH scheme. When metal theft had first become a problem it was felt that English Heritage's insistence that metal, where stolen from a heritage building,

[25] Giles, Lloyd and Playfor (September 2012)

be replaced with like-for-like, was exacerbating the problem[26]. However, it became clear that the organisation was now taking a more pragmatic and proactive approach to the problem exemplified in a series of publications[27] providing guidance on heritage crime prevention, interventions (including prosecution), preventing and dealing with theft of metal from churches and the production of heritage crime impact statements. The focus on these topics was particularly welcomed as the commission learnt from the Diocese that in the past the Police and magistrates had taken a long time to respond and appeared uninterested[28]. Guidance on the production of impact statements was felt to be particularly helpful in assisting those who had been the victim of metal theft to articulate the impact of the crime to the relevant enforcement agencies.

48. In its session with Mark Harrison, National Policing and Crime Advisor at English Heritage, the commission also welcomed suggestions for the development of community-based responsibility for and awareness of heritage assets, particularly amongst young people. This was again felt to be an area where the council could act as a platform, facilitating the involvement of, for example, local youth groups, Girl Guide or Scout Troops and acknowledging the role that this would play in the development of a 'sense of place'[29]. This was similar to the suggestion made by Richard Moore, Chair of Thurlow Park Safer Neighbourhood Panel, who suggested to the commission that a Lambeth Heritage photo competition may encourage people to take more responsibility for heritage assets[30]. The commission felt that such approaches would prove a welcome, and inexpensive, addition to the council's Urban Heritage Watch proposals.

Infrastructure

49. Unsurprisingly, given their access to the necessary funds, the commission found the use of alarms to be widespread by Network Rail and British Telecom. Simon Davies, General Manager for Cable and Payphone Crime (BT) highlighted the RABIT (Rapid Assessment BT Incident Tracker) alarm system which enabled BT to identify immediately where unauthorised cuts

[26] LB Lambeth (September 2012)
[27] See http://www.english-heritage.org.uk/professional/advice/advice-by-topic/heritage-crime)
[28] Ibid.
[29] Bradley et al. (2011)
[30] LB Lambeth (September 2012)

were made to its cable and send information to police control centres immediately. Similarly Network Rail had successfully used tremor alarms to prevent theft. However, despite the success of alarms and other preventative measures (such as smartwater and physically locking down infrastructure) protecting the network represented only one part of British Telecom's three-pronged approach. The remaining steps were: choking the market, through visiting scrap metal dealers and ensuring that there is no easy route for the disposal of BT cable through non-authorised dealers; and engagement with government, the trade, the police (sharing intelligence) and communities (for example working with crimestoppers and undertaking mailshots of areas where there has been metal theft).

50. Mr Davies informed the commission that one of the difficulties that they had experienced nationally was a lack of local enforcement activity. The commission welcomed Mr Davies' offer to work more closely with the council and felt that in terms of communications, intelligence-sharing and joint operations (such as joint visits to scrap metal dealers) there was considerable scope for such work.

51. Network Rail provided the commission with information on their four-fold strategy to tackle metal theft which had seen delay minutes reduce by 51% since 2011. This focussed on:

- Engineering - the use of CCTV, alarms and making access more difficult
- Education – increasing awareness including lobbying activity on the Scrap Metal Dealers Bill
- Enforcement – working closely with British Transport Police, visiting dealers and sharing intelligence via the fusion intelligence unit
- Enablement – the operational response to incidents and use of security patrols in key areas

Recommendation:	That partnership working with the full range of those operating in the policy area be improved

Scrap Metal Dealers

52. Whilst the commission was unable to meet formally with representatives of the British Metal Recycling Association (BMRA) members acknowledged that legitimate scrap metal dealers were often the victims of crime. This view was reinforced when the commission undertook a visit to, and met with the owner

of, Glynn's Metal Recycling in Loughborough Junction, Lambeth. Security at the site was considerable and included ANPR technology. Paul Glynn, who owns and manages the site came to the commission's attention when he purchased, in order to return, a memorial plaque that had gone missing from a church in Camberwell some 30 years previously[31]. Mr Glynn informed the commission that there was little benefit in trading in stolen materials as the risks outweighed the limited profit available. It became clear to the commission that the borough's registered scrap metal dealers operated at the front-line of metal theft with thieves regularly attending the premises to try to dispose of stolen metal and being abusive and making threats if such attempts were refused. This insight was particularly meaningful for the commission as it emphasised the opportunity which existed to establish close working relationships between local scrap metal dealers and the relevant authorities to tackle the trade in stolen metal. Whilst Mr Glynn indicated that he had regular visits from, and a strong relationship with, the local police he had never had any contact with the local authority or other regulatory authorities.

53. In his presentation at the LGA conference, Ian Hetherington, Chief Executive of the BMRA indicated that the majority of SMDs in the UK were registered with the BMRA but there was a 'long tail' of small dealers who were not. Whilst membership of the BMRA is not necessarily an indication of legitimacy this point was used to emphasise that the Scrap Metal Dealers Bill 2013 would not work unless it was effectively enforced by all the relevant powers. Mr Glynn made a similar point when he emphasised to the commission that the presence of unscrupulous dealers, and their ability to continue operating, made business harder for registered dealers as those who were not registered were able to pay more than the going rate for metals because they did not have the same overheads.

Other local authorities

54. The commission found the Local Government Association's Metal Theft Toolkit a helpful document setting out some of the approaches to metal theft that had been undertaken at other local authorities[32]. This included voluntary codes of practice for scrap metal dealers developed by Birmingham City Council (see appendix 1), Kirklees, Forest of Dean and the British Metals Recycling

[31] South London Press (2012)
[32] Local Government Association (2012)

Case study: Bexley

In December 2011 a multi-agency Metal Theft Task Force was formed and comprised; police, two BT Metal Theft Investigators and an Environmental Crime Officer from London Borough of Bexley. This core team was assisted by Bexley Trading Standards and Neighbourhood Services Team, Registered Social Landlords, Smartwater, Environment Agency, DWP Benefit Fraud Team, HMRC Criminal Taxes Unit and BTP Metal Theft and Cable Crime Team.

In the three months the team made 24 arrests, 12 proactive operations were carried out, 25 search warrants were executed, 22 scrap metal dealers visited, 11 vehicles seized and 17 people reported for other offences.

During the period 1st October 2010 and 30th September 2011 Bexley borough suffered 634 recorded metal theft crimes, which included a series of thefts of dry riser valves from 18 tower blocks. At one stage 85 valves were stolen and 16 of the 18 blocks had no valves left at all. The loss of one valve rendered the whole system inoperable and no water could be directed to any level of the block in the event of a fire. The cost for repairs and replacements was around £75,000.

In addition drain cover thefts totalled 180 during 2010 and 2011, costing over £52,000 to replace. Local people were outraged by the theft of memorial plaques from the Bexleyheath and Sidcup war memorials. The repair bill for copper water tanks, piping and intercom wiring systems that were stolen from newly refurbished flats in Thamesmead was over £250,000.

British Telecom also suffered frequently, with one estate in Erith having underground cable stolen three times. On each occasion over 200 telephone lines were knocked out for a period of three days.

The team carried out a series of operations on roads leading to scrap metal yards to disrupt the activities of thieves and those involved in the illegal transport of waste.

Joint inspections of scrap metal yards were conducted to search for stolen property and to check they were complying with legislation. Owners were encouraged to adopt a code of practice and keep records of all transactions and the team ensured the yards displayed signage to demonstrate partnership working and to deter thieves.

Other tactics included property marking, seizure of uninsured and unlicensed vehicles, 'theft alerts' to yard owners and crime prevention advice. Social landlords were advised when stolen property was recovered and offenders were placed under threat of eviction. Tax evasion and benefit fraud were referred to the Department of Work and Pensions fraud team and Her Majesty's Revenue and Customs criminal taxes unit.

All this work was supported by a media campaign that highlighted the safety risks and also the immoral act of stealing bronze plaques from war memorials.

Association. In most cases these codes went further than either Operation Tornado or the soon-to-be enacted Scrap Metal Dealers Act 2013. However, the commission welcomed the local emphasis that such a code provided and the initiative that they demonstrated these authorities were taking.

55. In London, Bexley (see case study and publicity materials at Appendix D) was identified as demonstrating best practice. The commission was particularly alarmed at the theft of dry-riser valves and wished top seek assurance that a similar pattern of theft had not taken place in Lambeth. Enfield and Hillingdon were cited as having taken proactive steps in relation to registering itinerant dealers. In Enfield all individuals wishing to register as itinerant dealers are required to attend the council's offices by appointment to demonstrate how they will maintain the required records and demonstrate possession of the relevant waste carriers licence. Furthermore representatives of the Police and Department for Work and Pensions attend to ensure that the applicant is not otherwise of interest to them or claiming relevant benefits. In Hillingdon all applications for registration are passed to the local Police who then pay a visit to the applicant in person. Both approaches were reported as having been effective. The commission also noted that anti-social behaviour powers had been used in Hillingdon to curb the activities of one particular individual known to the Police[33].

Recommendation:	That the Cabinet Member for Public Protection, in partnership with the council, Lambeth Police and Operation Ferrous, lead on the development and implementation of a voluntary code of conduct for scrap metal dealers and motor salvage operators in the borough based on the best practice identified in this report
Recommendation:	That Lambeth's housing client team ensure an urgent audit is undertaken of the presence of dry-riser valves at the borough's communal housing blocks and consider introducing warning signs and security at dry-riser locations (see timescales in action plan (Appendix C))

[33] Metropolitan Police (2013)

56. The commission also welcomed the engagement of Lambeth's neighbours in tackling metal theft. Colleagues in Wandsworth had undertaken successful joint work with the Police and UK Border Agency as part of Operation Ferrous[34] and were also known to be engaged with English Heritage's ARCH programme. In Southwark considerable attention had been paid to the issue following the high profile thefts of public art and Richard Ottaway MP's support for the Scrap Metal Dealers Bill 2013 demonstrated commitment to the issue south of the borough.

[34] Metropolitan Police (2012)

Conclusions

57. In drawing together its findings the commission was conscious that reported figures for metal theft were declining both nationally and in London and that metal theft was not a policing and crime priority for the borough. However, members did not consider this a reason for not taking any action. The close link between metal theft and commodity prices emphasised the fragility of the declining trend and the number of scrap metal dealers in and around Lambeth, coupled with the correlation between dealer numbers and crime volume leads, remains high. This, along with the personal and financial impact of the crime leads the commission to conclude that there remains a need for action to be taken.
58. In terms of the council's approach the commission found a tale of two divisions. In particular the commission concluded that there was considerable scope for the council to take a more proactive approach towards its relationship with the local scrap metal trade both through rigorous enforcement of the existing range of legislation and the promotion of a voluntary code of practice. Pinning the council's activity solely on implementation of the Scrap Metal Dealer Act 2013 was not, in the commission's view, the right approach to be taking. The partnership action plan was a welcome step towards this more proactive approach but it was not clear to the commission how rigorously the plan would be implemented nor how the move towards a 'community safeguarding' model would ensure this implementation.
59. In line with the action plan the commission welcomed the steps that the council had begun to take in working with the Police and English Heritage. However, it was clear from the information received that the opportunities for closer partnership working were wider than these two organisations. The commission received offers for closer working from British Telecom (communications, intelligence, joint visits) and the Diocese of Southwark and indications that they would welcome closer working from those responsible for local church and heritage assets. This bodes particularly well for the Urban Heritage Watch proposal (which the commission fully supports) and presents opportunities for the cost-burden on the local authority to be reduced.
60. The commission was clear that over-and-above the implementation of the action plan there were no legal barriers to the council putting into place a voluntary code of conduct straight away, whether by itself or in partnership with the Police or others.

61. However, what also became clear was that, due to the geography of London, any action taken within Lambeth would have limited impact if it was not replicated by our neighbours. A coordinated approach is required whereby downward pressure on the trade is exerted across the sub-region and best practice and resources shared to drive the illegal scrap metal trade out of London. This is no small task, but a Met-wide approach and pockets of best-practice already exist. It is the commission's view that these pockets just need to be joined up and that Lambeth and its neighbours are well-placed, and have been victims long-enough, to begin this work and demonstrate its value to the rest of London.

Recommendations

(A) That Lambeth exercises its responsibilities as London's first ARCH borough in recognising heritage crime, including metal theft, as a priority for the borough (P1/T3)

(i) That as a signatory to the ARCH Memorandum of Understanding the council appoint a councillor to act as a Heritage Champion (P1/T3)

(ii) That the council identify a single point of contact for metal theft of sufficient seniority to direct officers and take a strategic approach

(B) That the Cabinet Member for Public Protection, in partnership with the council, Lambeth Police and Operation Ferrous, lead on the development and implementation of a voluntary code of conduct for scrap metal dealers and motor salvage operators in the borough based on the best practice identified in this report (P1/T3)

(C) That following development of a draft code of conduct the Cabinet Member for Public Protection, supported by the Chair of the Commission, lead on negotiations with Lambeth's neighbouring boroughs to secure commitment to implementing the code across the sub-region, lay the foundations for future partnership work against metal theft and demonstrate to the rest of London that by working together metal theft can be driven out of our area (P1/T6)

(D) That the Safer Lambeth Partnership, and relevant constituent partners, adopt with immediate effect the Lambeth Metal Theft Scrutiny Commission Partnership Action Plan (Appendix C) and implement actions accordingly (P1/T1)

(i) That progress against the plan's key milestones be reported back to Environment & Community Safety Scrutiny Sub-Committee

(E) That reassurance be sought from the Borough Commander that Lambeth Police are fully committed to tackling metal theft ,resourcing it accordingly and that specific consideration be given to the following

(i) That confirmation be provided of who the single point of contact for metal theft is in Lambeth Police and assurance given that they are of senior rank (P1/T3)

(ii) That consideration be given to equipping all officers with portable ultra-violet lights to enable them to immediately identify property marking such as SmartWater (P2/T6)

(F) That the Safer Lambeth Partnership make clear to residents what number they should call if they witness suspicious activity (P2/T6)

(G) That partnership working with the full range of those operating in the policy area be improved specifically (P1/T6):

(i) Links between the council and the British Transport Police 'fusion units' to ensure information, particularly red-flags on specific scrap metal dealers, is shared

(ii) Links with the Environment Agency, British Telecom and neighbouring authorities to ensure an accurate picture of the number of dealers in and around the borough and to explore undertaking joint action

(iii) Links with British Telecom's public relations team to identify opportunities for a shared communications campaign

(iv) Opportunities for joint training between the Police, council officers and partners so that each are aware of each others issues and powers (P1/T9)

(v) Opportunities for the Police and council officers to undertake joint operations such as Operation Cubo and the Metal Theft Days of Action

(H) That Lambeth's housing client team ensure an urgent audit is undertaken of the presence of dry-riser valves at the borough's communal housing blocks and consider introducing warning signs and security at dry-riser locations (see timescales in action plan (Appendix C))

(I) That the council report back to Environment and Community Safety Scrutiny Sub-Committee on how it disposes of its own scrap metal to ensure that the value is returned to the council (P3/T6)

(J) That all outstanding recommendations relating to council-owned or leased buildings from the council's insurers be implemented immediately (P1/T3)

Note:

The commission has prioritised its recommendations as either priority 1 (high), 2 (medium) or 3 (low) and provided a time-limit (T) by which the commission expects each to be completed should they be adopted. For example P1/T3 will represent a high priority recommendation with an expected time-limit of 3 months.

In responding to the commission's recommendations responsible authorities will be expected to identify specific milestones and target dates, resource implications and lead officers.

Notes and thanks

Terms of reference and core questions

The commission was established by the Environment and Community Safety Scrutiny Sub-Committee in May 2012 with the following terms of reference:

- To investigate the current scale of metal-theft in Lambeth and the existing response to the issue across the relevant agencies
- To identify the impact of metal-theft on the borough's residents, community groups, council and businesses
- To feed into, influence the development of, and support the development of Lambeth's response to Richard Ottaway MP's Private Members Bill
- To identify national and international best-practice in relation to the reduction of metal-theft
- To make evidence-based recommendations to the relevant decision-makers that will result in reductions in metal theft and other improvement to this policy area

The following core questions were identified by the commission at the start of its work:

- What trends regarding metal theft are emerging in the borough?
- What can the council do (together with its partners and the Metropolitan Police Service) to protect the buildings and monuments at risk?
- What can the council do to counteract the rise of metal theft?
- Having considered the government briefing on metal theft, what additional action can Lambeth as a borough and in partnership with neighbouring boroughs do to prevent and detect metal theft?

Methodology

The commission conducted three public information-gathering sessions as follows:

Date	Location	Attendees	Role/Organisation
30 July 2012	Lambeth Town Hall	Cllr Jack Hopkins	Cabinet Member for Public Protection, LB Lambeth
		Adrian Smith	Divisional Director, Culture & Communities, LB Lambeth
		Nicole Terrieux	Community Safety Service, LB Lambeth
		Kristian Aspinall	Community Safety Service, LB Lambeth
		PC Rob Harrison	Lambeth Police
		Dave Bright	Head of Consumer Protection & Sustainability, HRE, Public Realm

Date	Location	Attendees	Role/Organisation
		Robert Gardner	Trading Standards Manager, HRE, Public Realm
		John Smith	Licensing Manager, HRE Public Realm
		Mark Nicolson	Risk & Insurance Team, LB Lambeth
6 Sept 2012	St Luke's Church, W Norwood	Andrew Lane	Secretary, Southwark Diocesan Advisory Committee
		Mark Norris,	Senior Adviser on policing, community safety and re-offending, Local Government Association
		John Smith	Licensing Manager, LB Lambeth
		Colin Fenn	Friends of West Norwood Cemetery
		David Chapman	St Peter's Church, Streatham
		Richard Moore	Thurlow Park Safer Neighbourhood Panel Chair
2 Oct 2012	Lambeth Town Hall	Paul Playford	Ecclesiastical Insurance Group
		Leigh Ide	Ecclesiastical Insurance Group
		Simon Davies	General Manager for Cable and Payphone Crime, British Telecom
		DI Ash Cooper	British Transport Police
		Acting Inspector James Coomber	Metropolitan Police

The commission members attended the Local Government Association's conference *Licensing scrap metal dealers: councils' role in fighting metal theft* on 15 June 2012 at which representatives from British Transport Police, the Energy Networks Association, The Institute of Materials, Minerals and Mining, British Telecom, The British Metals Recycling Association, the Environment Agency, Chartered Institute of Environmental Health and best practice exemplars all spoke

In addition the Chair met with Mark Harrison, National Policing and Crime Advisor, Heritage Crime Programme & Alliance to Reduce Crime against Heritage (ARCH), English Heritage and attended the ARCH Conference at City Hall in October 2012.

Councillors Braithwaite and Ogden undertook a site-visit of Glynn's Metal Recycling, Loughborough Junction and met with the owner Paul Glynn and his staff.

At its inception the commission issued a press release. A survey was distributed to all faith groups known by the authority (100+) but only two responses were received. A considerable amount of desk-based research was also undertaken by the Scrutiny Team and fed back to the commission.

Thanks

The commission would like to extend its thanks to all those named above for their contributions to this piece of work

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Appendix A – Letter to Public Bill Committee

7 September 2012

PUBLIC BILL COMMITTEE - SCRAP METAL DEALERS BILL AMENDMENTS

Dear

Here in Lambeth we have established a metal theft scrutiny commission to investigate what steps the council and others can take to reduce metal theft in and around the borough. This follows a spate of high-profile metal thefts here and in neighbouring authorities. Our work continues and we will be drawing our report and recommendations together in October.

The commission has a keen interest in the passage of the Scrap Metal Dealers Bill and we understand that you are on the Bill committee. We welcome proposals for local authority licensing of scrap metal dealers and consider the Bill a welcome addition to the tools that we and our partners can use to tackle the problem of metal theft.

However, from the work we have undertaken it is clear that the ability to impose local conditions on a licence would enable us and our neighbours to better target the particular issues that we face in Lambeth and across South London. This flexibility in the Licensing Act 2003 has already proved successful in enabling the authority to address the local circumstances we face, such as responding to street-drinking. We also believe that such conditions should be allowed irrespective of whether a licensee has been convicted of a relevant offence.

As such we urge you to support the amendments by Mr David Winnick to Page 3, Clause 3 that would enable the authority to employ other such conditions that are consistent with preventing crime.

Yours sincerely

Cllr Jennifer Brathwaite
Chair, and on behalf of, LB Lambeth Metal Theft Scrutiny Commission
Email: @lambeth.gov.uk

Appendix B – List of Scrap Metal Dealers registered with LB Lambeth

Name	Individual or company	Reason for registration	Premises address (if applicable)	Itinerant collector?	Date registered	Registration expires
Paul Barnaby	Individual	Occupies premises as scrap metal store	Arch 439 Gordon Grove, London, SE5 9DW	No	14/09/2010	13/09/2013
Jose Carlos Rodriques	Individual	Does not occupy premises, lives in Lambeth	None	Yes	08/03/2011	07/03/2014
Mr Tipper	Company	Occupies premises as scrap metal store	1 Wellfit Street, London, SE24 0HJ	Yes	05/08/2011	04/08/2014
Daniel Menino	Individual	Does not occupy premises, lives in Lambeth	None	No	07/09/2011	06/09/2014
Glynn's Metal Recycling	Company	Occupies premises as scrap metal store	3-11 Wellfit Street London SE24 0JA	Yes	20/10/2011	19/10/2014
Carlos Alberto Abreu Ribeiro	Individual	Occupies premises as scrap metal store	Garage No 17, Stradle Road, London, SW4 6TE	Yes	21/10/2011	20/10/2014
Jose Manuel Mendes Soares	Individual	Occupies premises as scrap metal store	Garage No 17, Stradle Road, London, SW4 6TE	Yes	21/10/2011	20/10/2014
Adel Testouri	Individual	Does not occupy premises, lives in Lambeth	None	Yes	01/02/2012	31/01/2015
John Virgo	Individual	Does not occupy premises, lives in Lambeth	None	Yes	15/02/2012	14/02/2015
Mr Matthew Henderson	Individual	Does not occupy premises, lives in Lambeth	None	No	20/03/2012	19/03/2015
Daniel Hewett	Individual	Does not occupy premises, lives in Lambeth	None	No	08/05/2012	07/05/2015
JonJon Thompson & Variel Muir	Individual	Does not occupy premises, lives in Lambeth	None	No	08/06/2012	07/06/2015

Appendix C – Lambeth Metal Theft Scrutiny Commission Partnership Action Plan – February 2013

SUMMARY/OVERVIEW
This action plan is the result of in-depth scrutiny of the issue in the borough by the Lambeth Metal Theft Scrutiny Commission. In addition, Lambeth became the first Action to Reduce Heritage Crime (ARCH) borough in London in February 2012. By signing up to ARCH Lambeth has demonstrated its commitment to prioritising metal theft and has adopted a number of responsibilities in agreement with English Heritage which are set out within the Scrutiny Commission's report. The Metal Theft Scrutiny Commission has prioritised its recommendations as either priority 1 (high), 2 (medium) or 3 (low) and provided a time-limit (T) by which the commission expects each to be completed should they be adopted. For example P1/T3 will represent a high priority recommendation with an expected time-limit of 3 months. Progress against actions by accountable officers will be monitored and reviewed by the Commission.

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
1.	**Develop intelligence: Increase intelligence of the scale and impact of metal theft in Lambeth to drive targeted, co-ordinated activity that secures the greatest impact for the least investment of resources**				
1.1	**Exercise responsibilities as London's first ARCH borough**	• Recognise heritage crime, including metal theft, as a priority for the borough through adoption of heritage crime as a priority for the council and the Safer Lambeth Partnership through inclusion in the annual Strategic Assessment and resulting Partnership Plan	Agency: Safer Lambeth partners Officer(s): Lambeth Council (LBL) Chief Executive/ Lambeth Police Borough Commander	P1/ T3	
		• Appoint a Councillor to act as Heritage Champion for the borough	Cllr Lib Peck, Leader of Lambeth Council	P1/ T3	
		• Identify a single point of contact (SPOC) for the council for metal theft of sufficient seniority to direct officers and take a strategic approach	LBL Cllr Jack Hopkins/ Adrian Smith	P1/ T3	
		• Confirm SPOC for metal theft in Lambeth Police (to be of senior rank)	MPS Borough Commander	P1/ T3	
		• Heads of Service from each responsible area to provide written report against compliance with ARCH criteria to next Scrutiny meeting	LBL/ MPS Heads of service for designated areas	P1/ T = next Scrutiny meeting	
		• Report back on progress against the plan's key milestones	LBL/MPS Lead officers as set out in action plan	P1/ T = Scrutiny meetings going forwards	

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
1.2	**Scope scale and risk**	• Carry out audit of existing assets, estimated value and risk, to baseline and scope scale and cost of metal theft in Lambeth • Establish priority list from assets audit, devise approach to target hardening and implement according to priority ranking and resources available • Establish risk re council buildings	LBL Mark Nicolson, Insurance and Risk (MN)	P1/ T6	Initial evaluation of loss carried out.
1.3	**Build problem profile and co-ordinate intelligence**	• Devise and introduce alert log to monitor overview of metal theft • Circulate key contacts with monthly info request/ update	LBL Community Safety Analyst	P3/ T9	Alert log to be submitted to Partnership Tasking and Co-ordination (PTAC) Group. Key contacts to be identified within council departments, MPS and partner organisations (e.g. BT) Resource to be identified.
		• Include a separate classification within CRIS to record metal theft • Promote use of metal theft tags on CRIS • Cross-refer reports of burglary (domestic/ non-domestic) • Compile initial intelligence profile based on existing database information	MPS/ Nominated officer	P1/ T3	Two metal theft flags now available on MPS crime logging system ('infrastructure'/ 'non-infrastructure') Scope for further awareness-raising re recording of metal theft. Initial metal theft profile completed in 2011.
		• Bid to Treasury for funding for analysis and support	LBL/ Nicole Terrieux (NT)	P2/ T6	
1.4	**Improve partnership working with the full range of relevant partners**	• Build links between the council and the British Transport Police 'fusion units' to ensure information, particularly red-flags on specific scrap metal dealers, is shared • Build links with the Environment Agency, British Telecom and neighbouring authorities to ensure an accurate picture of the number of dealers in and around the borough and to explore undertaking joint action	LBL John Smith, Licensing LBL John Smith, Licensing	P1/ T6 P1/ T6	
1.5	**Support legitimate Scrap Metal Dealers**	• Supply checklist reminder and key contacts to report intelligence re suspicious activity or people	LBL John Smith, Licensing	P1/ T3	See 3.1.
1.6	**Implement legislation as set out in the Scrap Metal Dealers' Act**	• Scope out process and determine fee levels based on cost recovery and within legislative limits	LBL John Smith, Licensing	P2/ T6	Report on process, fee levels and anticipated income to next Scrutiny meeting.
1.7	**Ensure value for money in disposal of council assets, refurbishment of Housing schemes and properties, and in regeneration programmes**	• Report back to Environment and Community Safety Sub-Committee on how the council disposes of its own scrap metal to ensure that the value is returned to the council	LBL Sue Foster, Housing Regeneration and Environment	P3/ T6	
2.	**Prevention: Deter, delay and disrupt offending through co-ordinated activity**				
2.1	**Protect most vulnerable assets**	• Devise approach to target hardening and implement according to priority ranking and resources available	LBL/ MPS NT/ MPS nominated officer	P2/ T12	Following evaluation and prioritisation of assets (see 1.1 above).
		• Carry out predictive patrolling in vulnerable locations with support from Trading Standards	MPS/ LBL Trading Standards	P2/ T12	

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
		• Implement all outstanding recommendations relating to council-owned or leased buildings from the council's insurers with immediate effect	LBL Uzochukwu Nwanze, Valuation and Asset Management Services Marc Nicolson	P1/ T3	
		• Compile briefing on metal theft and key contacts for dissemination to CCTV Manager/ monitoring staff • Provide list of heritage and memorial assets to CCTV Manager	MPS/LBL Nominated officer/ NT	Briefing: P2/ T3 Assets: P2/ T3	List of known war memorials can be extracted from In Memoriam 2014.
		• Replace all metal equipment in council owned public toilets with plastic where possible	LBL/ MPS MPS nominated officer/ NT/ LBL Facilities Mgt/ Parks	P3/ T12 (see right)	Dependant on compilation of initial inventory of assets To be costed Dependant on costings
2.2	**Reduce opportunities for metal theft**	• Build metal theft vulnerability considerations into requirements for new developments in the borough through Secured By Design (SBD) approach	MPS/ LBL MPS: PC Rob Harrison/ PC Anne Burroughs LBL: Planning nominated officer	P1/ T3	
2.3	**Protect Community assets: Heritage buildings/ Churches/ Public art/ War memorials**	• Compile war memorials database • Rank according to 'Protect most vulnerable assets' above • Protect most vulnerable war memorials with Smartwater • Apply for membership to the 'Alliance to reduce Crime Against Heritage' through English Heritage	LBL/ MPS LBL NT MPS contact tbc by MPS Lambeth Borough Commander	P2/ T6	All known war memorials in the borough are logged on the In Memoriam 2014 database. Lambeth is the first ARCH borough in London.
		• Establish SPOCs for each denomination for churches/ religious buildings in Lambeth at risk from metal theft	MPS/LBL Nominated officer/ NT	P3/ T12	Will need to establish what assistance we can offer and our approach before making contact
		• Launch Lambeth as Urban Heritage Watch borough in association with English Heritage	LBL NT	P2/ T6	
2.4	**Protect highways infrastructure and street furniture (Council)**	• Share intelligence re scheduled streetworks through inclusion of MPS SPOC in distribution of weekly circulation list	LBL Doug Perry	P1/ T3	Underway as at July 2012, however needs to be refreshed for MPS SPOC (to be nominated by Borough Commander)
		• Agree and establish approach re unscheduled emergency streetworks	LBL/ MPS Doug Perry/ MPS SPOC	P1/ T3	Unscheduled works are alerted on ad hoc basis to specific named individuals. Email list can be updated once SPOC alerted.
		• Establish approach and published protocol re verification of on-site contractors by MPS	LBL/ MPS Doug Perry/ MPS SPOC	P2/ T6	
		• Agree council 24/7 contact for MPS to check sites, contractors and activity	LBL/ MPS Doug Perry/ MPS SPOC	P2/ T6	Agree council SPOC or publicise rota.
2.5	**Protect highways infrastructure and street furniture(TfL)**	• Mirroring approach in 2.4 above, establish approach with TfL	LBL/ MPS NT/ MPS SPOC	P2/ T9	Establish TfL contact

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
2.6	**Protect partner assets**	**BT; UK Power networks; Thames Water** • Share intelligence re scheduled utility works through inclusion of MPS SPOC and Council CCTV Manager in distribution of weekly circulation list for each agency • Agree and establish approach re unscheduled emergency utility works	LBL/ MPS Doug Perry/ MPS SPOC	P2/ T6	
		Schools and colleges • Circulate schools (LA and independents) and colleges in the borough on benefits of Smartwater and offering training	LBL/ MPS NT/ MPS SPOC	P2/ T9	Smartwater kits to be purchased by schools and colleges themselves
2.7	**Reduce impact on emergency services**	• Compile inventory of dry riser inlets in housing blocks – location and state condition • Undertake an urgent audit of the presence of dry-riser valves at the borough's communal housing blocks and consider introducing warning signs and security at dry-riser locations	LBL to compile in partnership with housing providers Phase 1: Lambeth Living Phase 2: other social housing providers operating in the borough	Phase 1 P1/ T6 – inventory Phase 1 P1/ T12 - secure Phase 2 P2/ T12 – inventory Phase 2 P2/ T18 - secure	This action especially important re fire safety
2.8	**Reduce the likelihood of terrorist attack and its impact**	• Assess vulnerability to communications links for command and control centre (Police stations/ Main Command Centre – Lambeth) • Assess vulnerability to communications links for CCTV control room • Ensure communications system back up plan in place	LBL Stephen Tippell/ MPS Counter-terrorism/ LBL Paul Randall/ CCTV Manager	P1/ T6	Communications back-up plan in place for MPS buildings
3.	**Enforcement**				
3.1	**Establish ongoing regime of engagement and monitoring of registered scrap metal dealers (SMDs).**	• Compile and maintain master list of registered SMDs • Carry out joint visits 4 x per year Ensure that registered dealers are adhering to legislation re cashless payments.	LBL Licensing/ Trading Standards	P1/ T6 Ongoing re visits	When designing an ongoing regime of engagement and monitoring of SMDs the regime is required to utilise the full range of powers currently available to the council and ensure compliance with the terms of existing registrations.
3.2	**Lead on the development and implementation of a voluntary code of conduct for SMDs**	• Lead on the development and implementation of a voluntary code of conduct for SMDs in the borough based on best practice identified in the Lambeth Metal Theft Scrutiny Commission report • Following the development of the draft code of conduct lead on negotiations with neighbouring boroughs to secure commitment to implementing the code across the sub-region, laying the foundations for future partnership work against metal theft and demonstrate to the rest of London that by working together metal theft can be driven out of the area	LBL Cabinet Member Cllr Jack Hopkins/ LBL Licensing LBL Cabinet Member Cllr Jack Hopkins/ Chair of Lambeth Metal Theft Scrutiny Commission/ LBL Licensing	P1/ T3 P2/T6	Liaise with Lambeth MPS and Operation Ferrous
3.3	**Establish ongoing regime of engagement and monitoring of registered Motor Salvage Operators (MSOs) also known as 'car breakers'.**	• Compile and maintain master list of registered MSOs • Carry out joint visits 4 x per year (MPS/ Trading Standards/ Licensing) to check compliance in most cases with MPS support.	LBL Licensing/ Trading Standards	P1/ T6 Ongoing re visits P1/ T6	One listed SMD in borough. Theft of motor vehicles has risen in other boroughs. Rate appears to have remained stable in Lambeth. Theft of motor vehicle

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
		• Develop compulsory guidance material for MSOs to adhere to continue lawfully trading		P1/ T6	sensors appears to be increasing.
		• Contact itinerant dealers and Scrap Metal Dealers (where possible) to ensure full compliance with current legislation and regulatory requirements		P1/ T6	
		• Create application forms for new and existing businesses following guidance from Central Government. Design form will follow legislative requirements		P1/ T6	
3.4	**Target metal thieves, illegal scrap metal dealers and Motor Salvage Operators.**	• Compile and maintain master intel list on unregistered SMD premises and operators for legal sanction • Undertake joint operations such as Operation Cubo and Metal Theft Days of Action • Consider equipping all officers on street duties with portable infrared lights to enable them to immediately identify property marking such as Smartwater	MPS/ LBL Intel list to be led by Licensing/ Trading Standards with MPS ANPR ops – joint with Licensing (e.g. Op Cubo) MPS Borough Commander	P1/ T6 P1/ T6 Operations: Ongoing P2/ T6	
3.5	**Share intelligence and good practice**	• Share intel re current picture with Croydon and neighbouring boroughs • Establish initial MPS/ Council borough network with Croydon, Bexley, Southwark to share intel and good practice	LBL/ MPS NT/ nominated MPS SPOC	P2/ T6	
3.6	**Target metal theft repeat offenders**	• Flag details of known/ previous offenders via ANPR operations	MPS/ LBL	P2/ T6	
4.	**Awareness and reassurance: Increase awareness of metal theft, incidents and risk; the community role in reducing metal theft, methods of reporting; and Partnership activity**				
4.1	**Increase awareness of metal theft, incidents and risk**	• Regular item at P-TAC • Raise awareness of metal theft in Lambeth to residents to encourage detection and reporting of theft. Include SNTs, Neighbourhood Watch; TRAs and Lambeth Living; Friends of Parks. Church wardens or Vicars. • Make clear to residents what number they should call if they witness suspicious activity • Identify opportunities for joint training between the police, council officers and partners so that each are aware of each other's issues and powers	LBL/ MPS LBL NT MPS contact tbc by Borough Commander LBL Community Safety/ Lambeth Police 'crib sheet' Communications – wider awareness LBL/ MPS Licensing/ MPS SPOC	P2/ T6 (PTAC: Ongoing – every two weeks) P2/ T6 P1/ T9	Approach to include definition, what to do and who to contact

Ref	OBJECTIVES	ACTIONS	Lead agency Lead officer	PRIORITY RANKING/ 1 = high 2 = medium 3 = low TIME LIMIT (in months)	Notes
4.2	**Build awareness among frontline officers**	• Develop and distribute factsheet and key contacts for MPS SNTs and all council staff to focus on frontline staff	LBL/ MPS LBL NT MPS contact tbc by Borough Commander	P2/ T6	
4.3	**Develop public awareness through a communications forward plan which reflects the themes set out within 4 above**	• Provide press releases to publicise related activity and promote successes in combating metal theft. • Link with British Telecom's public relations team to identify opportunities for a shared communications campaign	LBL/ MPS LBL and MPS officers responsible for actions as set out in this plan/ Claire Melia LBL Communications/ Community Safety	P2/ T3 P1/ T6 P1/ T6	Planned activity to coincide with national days of action (at least 4 releases per year).

NO HONOUR
Amongst Metal Thieves

Thieves stole the identity of our heroes, now it's time to reveal their identity

Call Crimestoppers

0800 555 111

METROPOLITAN POLICE Working together for a safer London

Bexley

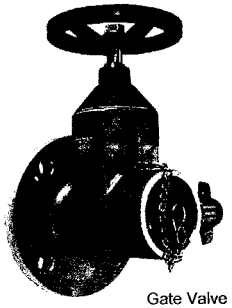
London CRIMESTOPPERS 0800 555 111 Call anonymously with information about crime

LONDON BOROUGH OF BEXLEY

BEXLEY POLICE NOTICE

THEFT OF GATE VALVES FROM HIGH RISE BLOCKS

Gate valves are being stolen from high rise blocks in the north of the borough. The Fire Brigade use these valves in the event of a fire to distribute water to all levels of a building.



Gate Valve

STEALING GATE VALVES PUTS LIVES AT RISK!

BEXLEY POLICE ARE WORKING WITH OTHER AGENCIES TO IDENTIFY THOSE INVOLVED AND PREVENT FURTHER THEFTS

If you know of anyone involved in the theft of gate valves please contact Bexley Police on 0300 123 1212 or, to remain anonymous call Crime Stoppers on 0800 555 111.

METROPOLITAN POLICE NEW SCOTLAND YARD

Appendix D – LB Bexley Metal Theft awareness publicity materials