

DMPC Decision – PCD 907

Title: Grant Funding Acceptance – Advanced Tools for Offender Management (ATOM)

Executive Summary:

This paper requests the acceptance of £246,750 grant funding from the Home Office to improve the digital management of Registered Sex Offenders (RSO) in London. The funding is available until 31 March 2021. The funding will be used to acquire new mobile triage equipment and monitoring software, and training for officers.

Recommendation:

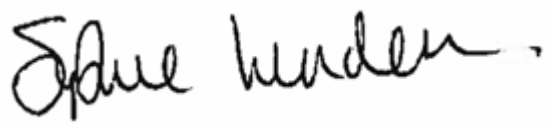
The Deputy Mayor for Policing and Crime is recommended to approve the receipt of £246,750 of grant funding from the Home Office to support the acquisition of digital equipment and associated training for the management of registered sex offenders in London.

Deputy Mayor for Policing and Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature



Date

11/01/2021

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

1. Introduction and background

- 1.1. This paper seeks the authority to accept Home Office funding to enable the acquisition of equipment and training to improve the management of registered sex offenders.

2. Issues for consideration

- 2.1. The grant will be used to fund the following
- new mobile triage equipment and monitoring software accounting for £126,000.
 - training - total cost no more than £120,000
 - in general digital investigation skills for all offender managers including the use of our existing office based search equipment.
 - to train a smaller number of digital specialists who could provide additional advice to their own teams. This would include.
- 2.2. The investment will help address gaps identified in Child Protection by Her Majesty's Inspectorate of Police and Fire and Rescues Services (HMICFRS).
- 2.3. The MPS state that the acceptance of the grant contributes to the MOPAC Police & Crime Plan priorities of "Keeping children and young people safe, and tackling violence against women and girls. Well trained and resourced offender managers aim to prevent re offending and bring those to justice who commit further offences."

3. Financial Comments

- 3.1. The proposal is for the acceptance of grant funding of £246,750 for 2020/21.

4. Legal Comments

- 4.1. The grant is accepted under Schedule 3, Paragraph 7 of the Police Reform and Social Responsibility Act 2011 which provides that
- 7(1)The Mayor's Office for Policing and Crime may do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of the functions of the Office.
 - (2)That includes—
 - (a)entering into contracts and other agreements (whether legally binding or not);
- 4.2. Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime (DMPC) has delegated authority to approve all bids for grant funding.

5. Commercial Issues

- 5.1. The grant funding will be used to acquire fast time triage tools and training, which can be deployed at an offenders address to check devices for Indecent Images of Children (IIOC) or other illegal content.
- 5.2. The intention is that the requirement is awarded as a Call-Off via the MPS' contract with CDW VAR (Value Added Reseller) contract. This is a recognised compliant route to market and allows the MPS to place Call-Offs with onboarded software and hardware suppliers.
- 5.3. Further non-device specific training for example general digital investigation skills will be procured through an existing training provider.

6. GDPR and Data Privacy

- 6.1. MOPAC will adhere to the Data Protection Act (DPA) 2018 and ensure that any organisations who are commissioned to do work with or on behalf of MOPAC are fully compliant with the policy and understand their GDPR responsibilities.
- 6.2. The MPS state that "The project will ensure a privacy by design approach, which will allow the MPS to find and fix problems at the early stages of any project, ensuring compliance with GDPR." and that "A DPIA has been deemed as necessary to support this activity and is currently under development. The MPS will not implement the use of the new equipment/training until the DPIA has been completed and any additional mitigations put in place. "

7. Equality Comments

- 7.1. MOPAC is required to comply with the public sector equality duty set out in section 149(1) of the Equality Act 2010. This requires MOPAC to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations by reference to people with protected characteristics. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2. The MPS has assured that this recommendation an extension of an existing service for sex offender managers. This work does not change any aspects relating to equality or diversity.

8. Background/supporting papers

- Appendix 1 MPS Report Grant Funding for ATOM (Advanced Tools for Offender Managers).

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOIA) and will be made available on the MOPAC website following approval.

If immediate publication risks compromising the implementation of the decision it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, for what reason:

Until what date: N/A

Part 2 Confidentiality: Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **Part 2** form – No

ORIGINATING OFFICER DECLARATION

Tick to confirm statement (✓)

Financial Advice:

The Strategic Finance and Resource Management Team has been consulted on this proposal.

✓

Legal Advice:

The MPS legal team has been consulted on the proposal.

✓

Equalities Advice:

Equality and diversity issues are covered in the body of the report.

✓

Commercial Issues

Commercial issues are not applicable.

✓

GDPR/Data Privacy

GDPR compliance issues are covered in the body of the report

✓

Director/Head of Service:

The interim Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.

✓

Chief Executive Officer

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

Signature



Date 16/12/2020



MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

Grant Funding for ATOM (Advanced Tools for Offender Managers)

MOPAC Investment Advisory & Monitoring meeting 18th December 2020

Report by DI Mike Sunman on behalf of the Chief of Corporate Services

Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC

EXECUTIVE SUMMARY

The Metropolitan Police Service has been offered grant funding from the Home Office (HO) to help improve the digital management of Registered Sex Offenders (RSO) in London. The money has been agreed in principle to cover the cost of purchasing equipment and training our offender managers to improve digital sex offender management and principally safe guard children and vulnerable adults.

MOPAC is asked to consider and approve the funding offer, which has been made by the Cumbria Police and Crime Commissioner (Cumbria PCC) acting as a conduit for Home Office originated funding. Cumbria act as a conduit in this case as Chief Constable Michelle Skeer (Cumbria Constabulary) is the National Police Chiefs Council lead for the Management of Sexual and Violent Offenders.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

Approve the receipt of £246,750 of grant funding from the Home Office to support the acquisition of digital equipment and associated training for the management of registered sex offenders in London.

Time sensitivity

A decision is required from the Deputy Mayor by 15/01/21. The offer of the grant agreement was made by the PCC Cumbria in September 2020 with a requirement to spend the grant money by 31/03/21. This is a very short timeframe to trial and verify efficacy of equipment and training products and secure their procurement and a decision at the earliest opportunity is required to enable best use of the funding, subject to approval. There are a number of high potential functions the MPS could take advantage of to improve sex offender management which currently have no funding stream available. Timely agreement to this grant funding would be very beneficial to modernising our sex offender management capability.

Non-confidential facts and advice to the Deputy Mayor for Policing and Crime

Introduction and background

1. The Metropolitan Police Service is responsible for the management of 6500 Registered Sex Offenders living in the community in London. A network of teams does this across London known locally as JIGSAW Units. The MPS also deals with 30 deported British sex offenders at Heathrow every year on behalf of all UK police forces.
2. In 2016 an HMICFRS inspection of the MPS approach to child protection, including sex offender management highlighted significant scope for improvement. Whilst much has subsequently been achieved in child protection, the JIGSAW Teams would benefit from being better equipped with the digital tools to manage sex offenders to prevent and detect offences against children. The HMICFRS re inspection in 2019 highlighted this issue in particular the need to professionalise the investigation of indecent images of children (IIOC) and digitally equip RSO managers.
3. Following the reports publication the MPS is in the process designing and delivering a number of projects the most relevant here being bespoke local teams that will specialise in the investigation of IIOC and the JIGSAW Digital Strategy to better equip our JIGSAW Units to manage offenders. The former was launched in January 2020 and is expected to significantly improve our detection rates for IIOC offences. Inevitably, this will mean that the JIGSAW Units will have an increase in offenders to manage for child sex abuse offences.
4. The aim of the JIGSAW Digital Forensic Strategy is to identify the correct amount of equipment for JIGSAW teams to manage growing demand and identify gaps in their ability to manage sex offenders effectively due to a lack of a modern digital toolkit. In 2020 the MPS have engaged with a new contractor to enhance our remote internet monitoring capability which has been very successful at detecting new criminal offences and breaches of civil orders. There are a finite number of licenses and we must invest further to meet anticipated demand.
5. The JIGSAW Digital Strategy review has identified that offender managers have no fast time triage tools, which can be deployed at an offenders address to check devices for IIOC or other illegal content. This is a significant gap in our current management of RSO's and enforcing their Sexual harm Prevention Orders. A JIGSAW staff survey recently established that even with new equipment our 210 staff need training to improve confidence in its effective and lawful use. These findings are in line with 2019 HMICFRS recommendations to better equip JIGSAW teams with triage tools and digital training.
6. Potential solutions have been identified for all these issues but none currently has a funding stream. It's anticipated that funding these solutions will take some time delaying their procurement and delivery.
7. The additional funding, which has been offered by the Home Office, would allow us to procure all the solutions in the Digital JIGSAW Strategy and give offender managers a comprehensive toolkit to detect and prevent child sexual

abuse. The funding would deliver the solutions in this financial year and would be overseen by the newly established Jigsaw Strategic Management Board.

Issues for consideration

8. There is a continuing trend for sex offending to start or wholly take place online. The 2019 HMICFRS Thematic Inspection on Child Protection highlighted “A better and more sophisticated approach to using technology to expedite examinations should be part of a wider and more coherent approach to digital policing.” The MPS is not digitally keeping pace with the offenders they manage. Properly resourcing and training offender managers will improve our safeguarding of children and vulnerable adults. The JIGSAW Digital Strategy is our comprehensive response to the HMICFRS recommendation.

Contributes to the MOPAC Police & Crime Plan 2017-2021¹

9. Sex Offender management works towards two MOPAC priorities. Keeping children and young people safe and tackling violence against women and girls. Well trained and resourced offender managers aim to prevent re offending and bring those to justice who commit further offences.

Financial, Commercial and Procurement Comments

10. The procurement of equipment and services in line with this grant will be governed internally by the JIGSAW Strategic Management Board. Some trials of equipment are already under way to test their efficacy for this specialist area of police work. The procurement will be handled by our commercial services team. It's expected that existing suppliers who have already demonstrated value for money could be used, however commercial will consider other providers who may offer better value if an equivalent product that meets our needs is available.
11. It is the intention that the requirement is awarded as a Call-Off via the MPS' contract with CDW VAR (Value Added Reseller) contract, this is a recognised compliant route to market and allows the MPS to place Call-Offs with on-boarded software and hardware suppliers.
12. Currently it's estimated that this grant money would be spent in the two areas specified by the Home Office. Firstly new mobile triage equipment and monitoring software accounting for £126,000. Secondly training in general digital investigation skills for all offender managers including the use of our existing office based search equipment. Finally we would look to train a smaller number of digital specialists who could provide additional advice to their own teams. This would in total cost no more than £120,000.
13. The technical solution has yet to be defined but the selection of an appropriate product or products will be jointly agreed with operations, DP and commercial.
14. JIGSAW staff must be able to comprehensively review internet enabled devices at the home address of a sex offender. A mobile tablet that can allow them to do this is currently absent from their management toolkit. There are several options in the market that can do this and whilst this would be new for

¹ [Police and crime plan: a safer city for all Londoners | London City Hall](#)

JIGSAW other forces already use similar devices. In addition the Central OCSAE team are also going to market for a similar device. This will allow for the triage of any internet enabled device at an offenders home address to check for any illegal activity. This would complement the static ADF units that JIGSAW staff already use to review devices that have been seized and returned to the station.

15. We have over 100 JIGSAW staff who are not trained in the static ADF units that JIGSAW already own. This training gap has simply come about due to new staff rotating into JIGSAW teams over time. This funding will support training in the use of the tablets for the teams which will be provided by the supplier of the mobile tablet that is purchased to maximise its benefit. Additionally, in response to our staff survey we would also invest in digital first responder course to give all JIGSAW staff a firm foundation in handling internet enabled devices with confidence. This course would not be device specific but cover a range of issues such as router reading, dark web searches and being confident searching different operating systems on different devices and would be delivered through an existing training provider who can supply the course.
16. Subject to approval, Cumbria PCC have supplied a Grant Agreement to formalise the arrangements which will require the signature of both the MPS Project Manager and the MOPAC CFO.
17. There are a number of monitoring requirements that must be met under this Grant arrangement, the performance against which must be outlined at specified intervals throughout the term. The funds to support expenditure will be released by the PCC, subject to confirmation that these reporting requirements have been met. There are no further costs implications for the MPS in buying a triage tool. The potential solution sourced through CDW (see para 11 above) will be purchased to include all support, licence and software updates for 3 years.

Legal Comments

18. Cumbria PCC is offering the Grant to MOPAC in exercise of the power conferred by part 11, section 143 of the Anti-Social Behavior, Crime and Policing Act 2014 (the Act”).
19. DLS consider that MOPAC have the legal power necessary to enter into this grant agreement. In relation to the receipt of grant monies, under Section 93 of the Police Act 1996, MOPAC “may, in connection with the discharge of any of its functions, accept gifts of money, and gifts or loans of other property, on such terms as appear to [MOPAC] to be appropriate”. Furthermore, under Schedule 3, paragraph 7 (1) Police Reform and Social Responsibility Act 2011 (the 2011 Act) MOPAC has incidental powers to “do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of the functions of the Office.” Paragraph 7 (2) (a) provides that this includes entering into contracts and other agreements. We consider that these powers are sufficiently broad to permit MOPAC to enter into the grant agreement.

20. Paragraph 4.8 of MOPAC's Scheme of Delegation and Consent requires the approval of the Deputy Mayor for Policing and Crime to approve the receipt of the grant.
21. The content of the grant agreement has been reviewed by commercial services without specific input from DLS, save for advice provided in relation to a proposal from the Cumbria PCC that the Commissioner also be a signatory to the grant agreement. This proposal has now been withdrawn by the Cumbria PCC.
22. The grant agreement will be published pursuant to The Elected Local Policing Bodies (Specified Information) (Amendment) Order 2012.

Equality Comments

23. This is an extension of an existing service for sex offender managers. This work does not change any aspects relating to equality or diversity.

Privacy Comments

24. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.

Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.

The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.

A DPIA has been deemed as necessary to support this activity and is currently under development. The MPS will not implement the use of the new equipment/training until the DPIA has been completed and any additional mitigations put in place.

The project will ensure a privacy by design approach, which will allow the MPS to find and fix problems at the early stages of any project, ensuring compliance with GDPR. DPIAs support the accountability principle, as they will ensure the MPS complies with the requirements of GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.

Real Estate Implications

25. There are no estate implications, training and equipment will be supplied to existing Jigsaw teams.

Environmental Implication

26. There are no environmental implications in delivering training and new equipment to existing Jigsaw teams.

Background/supporting papers

27. Nothing to add.

Report author: DI Mike Sunman, 07876038134

Part 2 – This section refers to the details of the Part 2 business case which is NOT SUITABLE for MOPAC Publication.

Not applicable