

DMPC Decision – PCD 706

Title: Information Sharing Platform

Executive Summary:

This paper sets out the proposed acceptance of £9.6m of funding from Pool Re. This is for a national information sharing facility to engage with the public and private sectors to improve awareness and preparedness of, and reaction to terror attacks. The outcomes expected from the investment are designed to address both the national 2018 review of the Governments Counter Terrorism strategy (Contest), and recommendations from Lord Harris' Independent review into London's preparedness to respond to a major terrorist incident. Pool Re is a government backed company providing a re-insurance facility to insurers in respect of terrorism. MOPAC are asked to approve the receipt of this funding as it hosts the National Counter Terrorism Policing Head Quarters which is leading this programme.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the acceptance of funding for the Information Sharing Platform pursuant to section 15 of the Police Reform and Social Responsibility Act 2011 with a contribution of £9.6 million.
2. Delegate the signing of the agreement with Pool Re to the MPS Director of Commercial Services.

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

Stephen Hinde

Date

2/3/20

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

1. Introduction and background

- 1.1. As part of the delivery of the Government's counter terrorism strategy (Contest) Counter Terrorism policing has engaged with PoolRe to develop a national Information Sharing Platform (ISP) fully funded by PoolRe.
- 1.2. MOPAC approved the initial acceptance of this funding in July 2019. Following further work with PoolRe and further legal advice the basis for the agreement has changed to one under section 15 of the Police Reform and Social Responsibility Act 2011.

2. Issues for consideration

- 2.1. The Mayor's number one priority is to make sure Londoners are safe. The ISP proposal is designed to deliver effective information sharing between the public and private sectors, in order to enhance collective safety and resilience. The platform targets Business and Industry but will be open to all and free to use.
- 2.2. Appendix 1 also sets out how the ISP will contribute towards the Lord Harris' independent review into London's preparedness to respond to a terrorist incident.

3. Financial Comments

- 3.1. The funding is £9.6m over a five-year period. There are no direct financial implications for MOPAC.

4. Legal Comments

- 4.1. Section 15 of the Police Reform and Social Responsibility Act 2011 (the 2011 Act) provides the Mayor's Office for Policing and Crime (MOPAC) with the legislative powers to charge for the supply of goods and services to a third party and make a charge to recover the full cost of providing those goods and services.
- 4.2. Clause 4.8 of the MOPAC scheme of Delegation requires the Deputy Mayor for Policing and Crime to approve all provisions of policing services to external bodies where the contract value is £500,000 or above and to approve incoming funding over £50,000.
- 4.3. The change from a sponsorship-based agreement to the Section 15, (supply of goods and services) has arisen from the need to reflect the PoolRe involvement in approving milestones and Intellectual Property Rights (IPR).

5. Commercial Issues

- 5.1. The relationship between MOPAC and Pool Re will be documented by way of an agreement under Section 15 (Supply of goods and services) of the Police Reform and Social Responsibility Act (2011).

- 5.2. In order to protect the MOPAC position NCTPHQ have committed to ensure the delivery is commenced within the timetabled period (3 months), within the contract charges paid are not recoverable by Pool Re, and Pool Re are responsible for reasonable (breakage) termination costs. Further, within the contract payments by Pool Re are made quarterly in advance.

6. GDPR and Data Privacy

- 6.1. The National Counter Terrorism Policing Head Quarters (NCPTHQ) acknowledge that there will be personal data issues associated with this programme of work, and note that a Data Protection Impact Assessment (DPIA) shall be completed for the ISP. The programme will use a "privacy by design" approach, which will allow the finding and fixing of problems at the early stages of any project, and ensure compliance with the requirements of GDPR.

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. As part of its development the ISP will be assessed for accessibility and disability compliance.

8. Background/supporting papers

- 8.1. NCPTHQ paper.

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:

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.

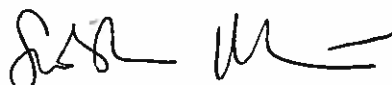
Is there a Part 2 form –No

ORIGINATING OFFICER DECLARATION	<i>Tick to confirm statement (✓)</i>
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 covered in the body of the report.	✓
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.	✓

Interim 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 28/1/20

**MOPAC****MAYOR OF LONDON**
OFFICE FOR POLICING AND CRIME**Counter Terrorism Policing - Information Sharing Platform****MOPAC Investment Advisory and Monitoring Meeting****Report by DCI Steven McGrath on behalf of the Deputy Commissioner****Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC*****EXECUTIVE SUMMARY***

MOPAC approval is sought to enter into an agreement with Pool Re under which Pool Re shall provide funding to the MPS to deliver an Information Sharing Platform (ISP). The core part of delivering this integrated relationship is effective information sharing between the public and private sectors, in order to enhance collective safety and resilience. The ISP targets business & industry but will be open to all and free to use. Multi-levels of access will ensure appropriate levels of security.

Approval by the Deputy Mayor is required because:

- The funding provided by Pool Re exceeds the £50,000 delegated authority threshold for incoming funding, and
- and the value of the Sharing Platform to be delivered by the MPS exceeds the £500,000 delegated authority threshold for the provision of policing services, both thresholds are as detailed section 4.8 in the MOPAC Scheme of Consent and Delegation.

Recommendations

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

- 1. Approve the acceptance of funding for the Information Sharing Platform pursuant to section 15 of the Police Reform and Social Responsibility Act 2011 with a contribution of £9.6 million.**
- 2. Delegate the signing of the agreement with Pool Re to the MPS Director of Commercial Services**

Time sensitivity

A decision is required from the Deputy Mayor by **28 February 2020**. This is because it is the date we anticipate signing the contracts to launch the initial phase of the project. Pool Re shall meet the full cost of the ISP. Without the sponsorship of the project there is no alternative funding secured and the ISP could not be delivered.

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

Introduction and background

1. Any terrorist attack is unacceptable, especially those which result in death or injury.
2. The Home Office has estimated that the 2017 terrorist attacks resulted in a cost to the UK of at least £2.1 billion. This consists of £0.1 billion in direct and £2.0 billion in indirect costs. Indirect costs consider the wider impact of the attacks on the UK's GDP and highlights the vulnerability the private sector carries in relation to terrorist incidents.
3. The 2018 review of the Governments Counter Terrorism strategy (Contest), gave increased focus to improving the exchange of information between government and the private sector – ultimately concluding there is a need for 'a more integrated relationship with the private sector' both to better protect our economic infrastructure and to scale our ability to tackle terrorism.
4. The ISP takes into account and acts upon the recommendations contained within Lord Harris' Independent review into London's preparedness to respond to a major terrorist incident October 2016. Although with a national reach and not restricted to specific sectors of business and industry.
 - a. Recommendation 79 – Communication should be improved with security operatives
 - b. Recommendation 107 – Metropolitan Police Service (MPS) should aim to provide information quickly
 - c. Recommendation 110 – The Mayor with the Cabinet Office to introduce a London wide pilot of new public alert technology
 - d. Recommendation 116 – There should be discussions with the insurance industry, so that businesses and venues are required to obtain and act on advice in return for lower premiums
5. The ISP will provide to Counter Terrorism Specialists, Security Industry Professionals, Business and Industry
 - a. Product Library
 - b. Knowledge Hub
 - c. E-Learning
 - d. Webinars
 - e. Discussion forums
 - f. Targeted Messaging
 - g. What works Centre
 - h. Action Counters Terrorism (ACT) online reporting
 - i. Prevent referral
6. Currently Counter Terrorism information is shared through a number of channels which are predominantly 'push out' in nature with no determination of reach or impact. Many of these channels will reach large corporations and multi-nationals while many Small and Medium Sized Enterprises (SME's) are under provided for.
7. The ISP will be able to connect with many subscribers reliably and quickly with

timely, authoritative information which is appropriate and actionable.

Issues for consideration

8. The funding for this project has been secured with partnership funding and as such will not impact MOPAC or MPS budgets.
9. The ISP Agreement may be terminated in the following circumstances:
 - By either party upon recommendation of the Sub-Committee after the design stage mid-point review.
 - Automatically if the delivery is not commenced within 9 months of the start of the agreement.
 - By Pool Re if the MPS is in breach
 - Any time after the first year of operations (by either party) on 20 days' notice.

To mitigate any financial liability to CTP and MOPAC the following actions have been put in place:

- CTP to ensure the delivery is commenced within the timetabled period (3 months).
 - Within the contract, charges paid are not recoverable by Pool Re and Pool Re are responsible for reasonable (breakage) termination costs.
 - Within the contract payments by Pool Re are made quarterly in advance
10. The ISP was conceived through the Step Change programme, a partnership between CT Policing, business and industry, to provide products and services they require at a time they want it. Information which is targeted and authoritative to meet the needs identified by business and industry. This is something requested by business and being delivered in a partnership with business.
 11. Although the target audience is business & industry, sections of the ISP will be available for security industry specialists and the public and is free to use.
 12. Following the 2 year Development Stage, the development project will follow a structured closure and handover methodology to the Operation Stage, which will be funded by Pool Re for a further 3 years.
 13. During the Operation Stage, the service will be evaluated and an approach agreed for transition to BAU at the end of the 5 year funding arrangement. These options will include:
 - Terminating the service
 - Make the service self-funding (potentially with paid content).
 - Bring the service into core CTPHQ business, e.g. via the Spending review planned in 2020.

14. Until BAU funding has been established, resources will only be secured via fixed term or if permanent they will be redeployed within CTP should the service be terminated.

Contributes to the MOPAC Police & Crime Plan 2017-2021¹

15. The ISP will contribute to the delivery of national protective security to protect beyond the 8.8m population of London and the huge number of visitors to the city each year. The ISP is a national initiative to improve protective security and resilience for the UK.
16. The ISP supports the Police & Crime Plan and the Governments Counter Terrorism strategy (Contest) in working on improving communication with business and industry to tackle international and domestic terror groups. Contributing to making London and the UK safer from terrorism.
17. Working to deliver recommendations of the Lord Harris independent review into London's preparedness to respond to a major terrorist incident October 2016. Delivering a technology based public alerting and messaging system, sharing information with business and industry, working with the security and insurance industry

Financial, Commercial and Procurement Comments

18. This proposal seeks approval to accept a contribution of £9.6 million from Pool Re pursuant to section 15 of the Police Reform and Social Responsibility Act 2011. These services have been obtained with procurement in line with agreed policies and legislation. The funding will cover the project management, set up, resourcing and running costs of the ISP, IT Support and analytics for a period of five years.
19. Normally contracts over the value of £5m are sealed to provide the benefit of extending the limit of liability from 6 years to 12. However, in this case we are the supplier and would not want to extend the liability of MOPAC under the agreement.
20. Therefore, it is intended that this contract is not sealed and the contract signature is delegated to the MPS Director of Commercial Services

Legal Comments

21. Section 15 of the Police Reform and Social Responsibility Act 2011 (the 2011 Act) provides the Mayor's Office for Policing and Crime (MOPAC) with the legislative powers to charge for the supply of goods and services to a third party and make a charge to recover the full cost of providing those goods and services.
22. The MOPAC scheme of Delegation at Clause 4.8 requires the Deputy Mayor for Policing and Crime to approve all provisions of policing services to external

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

bodies where the contract value is £500,000 or above and to approve incoming funding over £50,000.

23. TLT Solicitors via DLS have advised and supported in the formation of the agreement between MOPAC and Pool Re.
24. The relationship between MOPAC and Pool Re will be documented by way of an agreement under Section 15 (Supply of goods and services) of the Police Reform and Social Responsibility Act (2011). TLT Solicitors have confirmed that the provision of the ISP is a policing service (or ancillary to a policing service) and therefore is within the scope of Section 15.

Equality Comments

25. There are no identified or anticipated negative equality impacts relating to this proposal from an internal perspective.
26. From an external perspective, the ISP will be assessed for accessibility and disability compliance. The proposed contribution would assist in developing the package.

Privacy Comments

27. The ISP will have subscription sections where users will be required to provide personal information for validation and verification to gain access to more sensitive information and to ensure the security of the information accessed. Suitable information will be made available to the subscriber on that information in accordance with Data Protection and General Data Protection Regulation (GDPR). The ISP provides links to websites where sensitive information is held and the subscriber will be required to be an existing subscriber of that website and its security and Data Protection and GDPR regulations.
28. 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.
29. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) are mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects. A DPIA shall be completed for the ISP.
30. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
31. 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

32. There are no real estate implications relating to this proposal.

Environmental Implications

33. This proposal does not have implications for the Mayor's environmental strategy.

Background/supporting papers

34. None

Report author: DCI Steven McGrath – CTP Head of Information and Communication Capability (Protect & Prepare), NaCTSO, NCTPHQ 07976 562377

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

There is no information contained in this proposal that is exempt from publication