

Background information to the Police and Crime Committee's response to the Mayor's draft Police and Crime Plan

This document contains the responses to the Police and Crime's Committee's written call for views as part of its examination of the Mayor's draft Police and Crime Plan

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Dear Joanne,

Call for views: The Mayor's draft Police and Crime Plan

Thank you for your letter of the 11th January requesting responses on the above draft plan. Southwark Council will be submitting a full response to the overall plan by the deadline of the 6th March. However, we are pleased to provide feedback on the specific points that are set out in our letter as follows.

1) The extent to which you believe the Police and Crime Plan will deliver a cut in crime, and whether the Plan focuses on the crimes that matter to Londoners.

Southwark response:- Part of the challenge in developing a police and crime plan for the capital is the wide range of priorities and competing demands that exist across such a diverse city.

With the limited resources that are available to both the MPS and its local partners, it will be difficult to deliver a cut in crime if the plan adopts a “catch all” approach, which it appears to be trying to do in its current form. In addition the draft needs to take careful consideration of the wide economic and social changes that are beginning to have a major impact on crime levels, particularly those crime that happen in the home and in local neighbourhoods. Further pressure through the planned welfare reform will have a significant impact for individuals and families in certain neighbourhoods, who are already under severe pressure. These reforms have the potential of impacting on crime and anti social behaviour as socially disadvantaged groups may consider themselves as being more isolated, creating increased pressures.

The plan current lacks any specific analytical information that would provide a valuable context into what crime impacts where, when and who are affected, both as victims or offenders. This information would add richness to the overall plan and provide a strong evidence base so that clear priorities can be stated with more clarity. Most importantly it is likely that it would highlight some of the regional variations in terms of crimes trends, thereby enabling a sub regional approach to crime reduction and providing a greater opportunity to the cut crimes in areas where they impact most.

There does seem to be a disparity between the 7 crime types that the plan sets out for a 20% reduction over four years (burglary, vandalism/criminal damage, theft of and from motor vehicle, violence with injury, robbery and theft from the person) and the crime priorities that Londoners identified during consultation in 2012. The draft plan states that:-

“During 2012, the biggest concerns raised were anti-social behaviour; gangs; stop and search; and the relationship between young people and the police. Other issues that are commonly raised are the accessibility and visibility of the police, burglary and drug related crime as well as gun and knife crime and street crime.”

This would indicate that a better basket of indicators, which would tackle the crime that matter to Londoners would be:-

- Burglary
- Street crime including robbery
- Youth crime
- Weapon crime (gun and knife crime)
- Group offending
- Violence with injury (including domestic violence)
- Harassment (including a reduction in the number of repeat victims of anti social behaviour).

2) **Whether the Police and Crime Plan will lead to an increase in public confidence, particularly among groups that currently have low levels of satisfaction with the police.**

Southwark response:- If, over the four year period, the police and crime plan can deliver significant improvements to victim and witness care, improvements in sanction detections rates so that offenders are brought to justice and receive proportionate sentencing, communities see increased numbers of patrolling officers and there is a significant philosophical shift in the approach by the police in how they treat and engage with young people, the plan can increase public confidence. Local community safety partnerships will play a crucial role in engaging with those groups that have low levels of satisfaction with the police, particularly young people and victims of crime, and can provide opportunities to facilitate meaningful dialogue through their wide range of services.

3) **Whether the Metropolitan Police Service’s approach to neighbourhood policing and use of its estate will deliver what Londoners want.**

Southwark response:- As a council, we fully understand the challenges that the police face in reducing costs of buildings and front office counters. Such assets can be costly to operate and can potentially divert officers from much needed visible patrols.

We also recognise that this is an emotive subject; the local Police Station is not just a place where people can report crime but is also a symbol of a local police presence, a place where people fleeing from crime, or the threat of crime can seek sanctuary.

In terms of the police estate it is vital that MPS and MOPAC are able to articulate and sensible, workable alternative. This should include exactly what the alternative offer of local accessibility is, in terms of times, location and the level of support on offer. The consultation events in Southwark and Lambeth have already highlighted that there are “black holes” in areas across borough borders where there will be significantly less police

accessibility. The current plans are too ambiguous to say if the approach will deliver what Londoners want.

In terms of the neighbourhood policing model, we would have to state that, from a Southwark perspective, the model will not deliver what Londoners, living, working and visiting the borough will want. We support the flexibility that the Borough Commander will have in the deployment of their local resources. However, the proposals are that the average of additional 30 officers across 5 wards, will have responsibility for a broader remit, including investigating crime, responding to non emergency call and supporting victim and for priority offenders. The actual guarantee is a minimum of one police officer and one police community support officer per ward. The reality is that this increased role will reduce the visible presence of officers as they are involved in the investigation and bringing to justice of offenders, including the support of victims. It will be important that MOPAC and the MPS are transparent about impact of this changing role and what local communities can realistically expect in terms of a visible presence.

Southwark Council do believe that the MPS should take careful consideration of the remit and size of central specialist teams. We are strongly of the opinion that there is an opportunity to reduce the size of central teams, reduce unnecessary duplication and place much needed expertise at a borough level where it can have the greatest impact. We would be keen to work with MOPAC to explore this further during and after the consultation period.

Finally, in terms of the allocation of the additional 2,600 officers, we do not understand or agree with the rationale that only see Southwark receive and additional 2 officers on the 2011 baseline figures. In real terms we believe that Southwark has actually lost around 60 officers since May 2010, from the then borough establishment of 874.

Southwark, as one of the most strategic inner London boroughs, records some of the highest levels of crime across the capital. Southwark currently has the highest levels of robbery and youth crime in London with sanction detection rates amongst the lowest. Knife crime and domestic violence are also recorded in the highest quartile, compared to other similar boroughs. The recent increases in robbery and continued pressure of youth violence are major concerns, in areas which have high level of deprivation and social challenges.

The current figures for Southwark (April 2012 to January 2013) indicate that Southwark has high levels of violent crime compared to other London boroughs:

- Robbery, 2,044 offences and ranked 2nd highest
- Knife crime, 809 offences and ranked highest
- Serious youth violence, 368 offences and ranked highest
- Youth violence, 638 offences and ranked highest
- Domestic violence, 1691 offences and ranked 5th highest

This evidence does not support such a small increase in borough based resources and we would urge MOPAC to reconsider the allocation so that there is a significant increase in the borough based allocation to meet the demand in Southwark.

4) **How the changes proposed in the Police and Crime Plan will impact on the service received by Londoners.**

Southwark response:- The additional communication channels, particularly through on-line, social media and personal contact will be a positive step forward, as long as the contact is meaningful, timely and has an outcome for the person.

In terms of providing a personal visit to every victim of crime, particularly victims of serious crime, we would recommend that MOPAC take careful consideration of this proposal. There are other agencies and services, including council and voluntary organisations who are much better placed to provide such a service and support the police in this role. Local community safety partnership can develop a local network of organisations with the skills and knowledge to support victims of specific crimes and undertake such work to ensure that any such contact does not increase the possible risk to the person or their family.

The draft police and crime plan makes reference to the regional commissioning of services, particularly relating to domestic violence, elements of the offender management interventions and victim care services. It is important that careful consideration is given to such changes and the impact at a local level where the support for these vulnerable client groups in most needed. We would ask that there is an opportunity for councils to be involved in the scoping and development of such commissioning arrangements, with the option to explore other options such as sub regional or framework commissioning which enable small local organisations to be involved in delivering services at a local level.

5) **Whether the key performance targets set by the Mayor are the right priorities for Londoners.**

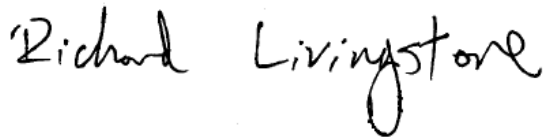
Southwark response: - We fully acknowledge the importance of setting clear performance targets that can be owned at a local level and be the responsibility of the police and local community safety partnerships. It is important to recognise that such targets have to be shared in partnership, if areas are to benefit from the wide range of local agencies and their resources. However, there needs to be a sub regional flexibility in terms of targets, assessment of the local variation in crime patterns and priorities as we have set out in our response to question 1 above.

Applying the mantra of “20%” across the targets does give the impression of being a political sound bite rather than a proper analytical assessment of the targets, particularly when applied to criminal justice outcomes, reoffending

targets and victim satisfaction. One target that does need to increase significantly is sanction detection rates. However on this point, the draft plan only makes reference to “improve the proportion of crimes that are actually solved”.

We hope that the above initial feedback is useful at this time. There are other areas of the draft plan that we will be responding to in more detail, as part of the consultation process. However if you wish to discuss any of the above points further we would be pleased to meet with you.

Yours sincerely,

A handwritten signature in black ink that reads "Richard Livingstone". The script is cursive and fluid, with the first letter of each word being capitalized and prominent.

**Councillor Richard Livingstone
Cabinet Member for Finance, Resources & Community Safety
London Borough of Southwark**

From: Gareth Scarlett
Sent: 14 February 2013 22:56
To: Claire Hamilton
Subject: Draft Police and Crime Plan

FAO Claire Hamilton, Secretariat, GLA

Dear Claire,

I am sending some feedback in response to the Draft Police and Crime Plan. This is somewhat rushed because I see that the deadline is 15th February, but the observation I wish to make is as follows.

There is no mention in the plan of road traffic 'accidents' and the high toll in terms of death, injury, trauma and family tragedy which they give rise to. According to Dept for Transport statistics, in 2011 in the Metropolitan Police Force area alone, 159 people were killed, 2,602 seriously injured and over 20,000 slightly injured on the roads. No doubt some of these events are genuine 'accidents' but a great many are caused by vehicles exceeding speed limits (which are largely unenforced, with very few speed cameras and a traffic police conspicuous by its absence) and hence breaking the law, and driving without due care and attention. This is to say nothing of the anti-social behaviour that speeding represents, blighting neighbourhoods with noise, pollution and danger and discouraging residents from leaving their homes and enjoying their local area.

I find it incomprehensible that no mention of this aspect of criminal behaviour is made in the draft plan, sending out the message that actions of this kind is of no consequence and insulting all those whose lives have been blighted and cut short by road traffic incidents.

I doubt that 159 people are killed annually in London by dangerous dogs, and yet this merits a paragraph in the draft plan whereas road crime does not. Why ???

Best Regards,

Gareth Scarlett

From: Shaun McNamee
Sent: 15 February 2013 01:56
To: Claire Hamilton
Subject: MOPAC Plan

Dear Claire,

I am submitting my feedback on the above. I am a joint business owner, employer and London resident.

I wish to express my concern that this plan does not in any way prioritise traffic related crime. Many of my employees and colleagues walk or cycle to work, it's healthy and good for their morale, but I feel the police do far too little to protect them from illegal and anti social behaviour by other road users, in particular but not exclusively, by motor vehicle operators.

I believe that anti social road behaviour (including but not limited to speeding, dangerous driving, failure to stop at pedestrian crossings, driving while using handheld mobile phones, illegally modified vehicles) causes similar damage to the physical and social fabric of communities as criminal damage such as graffiti and vandalism. Anti-social road behaviour can do just as much to incite fear and make public streets off-limits to parts of the community (especially vulnerable sections such as children) as youth violence

Making the streets a safer place for young people gives them a greater stake in their community. Far more young people are injured by vehicles than by street violence; this is not to necessarily blame the individual drivers involved in such incidents, but is part of a general social approach that "nothing can be done". Statistically speaking, traffic related crime & Anti social road behaviour causes a far greater burden of injury and death than street violence.

Further emphasis is needed in the MOPAC plan on the enforcement of road safety legislation by the Police Service in order that anti social driving abuses are identified and dealt with. The Police Service has a unique position in being able to influence anti social road behaviour, and additional legislation/public awareness will not, in my view, make any difference - only "boots on the ground" will make the difference.

Hence I would like to see the final plan reflect the reduction of anti social road behaviour as a Police Service priority.

Kind regards,

Shaun McNamee

From: Jim Gleeson
Sent: 09 February 2013 18:20
To: Claire Hamilton
Subject: Comments on draft Police and Crime Plan

Dear Claire,

Please find copied below my brief submission to MOPAC's survey on its draft Police and Crime Plan, for feeding into the Assembly's examination.

Regards,

Jim Gleeson

Dangerous and criminal driving is a big problem in London and addressing it should be one of the top priorities, but it is absent from the draft plan. In 2011 there were 121 homicides in London but 159 people killed in road collisions. Speeding and dangerous driving are major contributory causes to road casualties and can be significantly reduced by appropriate police measures.

Past surveys have also found high levels of public concern over the issue. The 2010/11 MPS annual report stated that "Road safety has featured consistently in the top five public priorities for policing, with speeding and dangerous driving major concerns", while traffic and road safety were the top priority reported in the Metropolitan Police Authority's 2010 'Have your Say' consultation.

Given these considerations, it is very strange that theft of and from motor vehicles are considered top priorities in the draft plan, but not the crimes committed (and lives ruined) by motor vehicle drivers. This omission must be addressed if the plan is to constitute an appropriate response to crime in London.

Certainty of detection and prosecution is the best deterrent to crime, and is entirely lacking when it comes to dangerous driving. A large and widely-publicised expansion of London's speed camera programme would tell drivers that they can no longer expect to get away with speeding, and higher detection and conviction rates for dangerous driving should have a similar effect. The numbers of road traffic police and the resources available to them should also be substantially increased.

From: Stephen Taylor
Sent: 13 February 2013 19:08
To: Claire Hamilton
Cc: South Hilliders; Londoners on Bikes; Dan Carrier; Niki Seth-Smith; lcc-issues
Subject: MOPAC Police and Crime Plan review

The Mayor's Office for Policing and Crime has drafted a [plan](#) for 2013-2017 and the London Assembly [invites comment](#) from the public.

This plan needs a good deal more work to fit its objective.

1. It begins, "The first duty of the Mayor is to protect Londoners." Seven kinds of crime are prioritised. Six kinds are crimes against property. Only one is a crime against the person.
2. Please compare the numbers of Londoners killed or seriously injured (KSI) (a) on London's roads (b) from violence with injury (c) by acts of terrorism. A plan to protect Londoners would allocate resources accordingly. Let the plan show the budgets in these three categories, and that they are in proportion to the KSIs.
3. The draft does not even mention road danger. The neglect is particularly bad because in the Met's own consultations road danger consistently figures in the public's top 5 concerns.
4. The neglect of road danger compounds complacency within the Metropolitan Police. In all other circumstances killing a human being is treated very seriously. But only one in three road fatalities even leads to a charge being brought – and only one in eight where the vehicle involved is a bus. The Mayor has unique power to change this culture, but no plan to do so.

With these faults, this is not a plan to protect Londoners. It is a plan to protect Londoners' property.

Please do better.

Kind regards

Stephen Taylor FRSA

From: Angus F. Hewlett
Sent: 14 February 2013 14:49
To: Claire Hamilton
Subject: Police and Crime Plan Review feedback

Dear Claire,

Submitting some feedback as a business owner, employer and London resident.

I wish to express my grave concern that this plan does not in any way prioritise traffic related crime. Many of my employees cycle to work, it's healthy and good for their morale, but I feel the police do far too little to protect them from illegal and anti social behaviour by other road users, in particular but not exclusively motor vehicle operators.

I believe that anti social road use (including but not limited to speeding, dangerous driving, failure to stop at pedestrian crossings, driving while using handheld mobile phones, illegally modified vehicles) causes at least as much damage to the physical and social fabric of communities as criminal damage such as graffiti and vandalism.

Anti-social road use can do just as much to incite fear and make places off-limits to parts of the community (especially children) as "gangs" of youths in hoodies.

Making the streets a safer place for young people gives them a greater stake in their community. Far more are injured by vehicles than by street violence; this is not to necessarily blame the individual drivers involved in such accidents, but to point the finger at a road culture that encourages driving too fast for conditions, and all too readily blames the victim instead of asking wider questions as to why such "accidents" happen.

Statistically speaking, traffic related crime & ASB causes a far greater burden of injury and death than street violence. I would like to see the final plan reflect this.

Best regards,

Angus.

London Borough of Newham's submission to the Police and Crime Committee

The London Borough of Newham (LBN) welcomes the opportunity to contribute to the London Assembly's Police and Crime Committee investigation into the Mayor of London's draft Policing and Crime Plan.

Our views on the main elements being consulted on, the draft Police and Crime Plan incorporating the 20:20:20 challenge to the Metropolitan Police Service (MPS) as well as the MOPAC's Estate Strategy are stated below.

Draft Police and Crime Plan:

Although the overall requirement for the plan is set out in law, it is unclear what form of strategic assessment has been undertaken to justify the measures it contains.

When local authorities produce a local crime reduction plan, it must be informed by a strategic assessment and public consultation. It would therefore seem logical that a pan-London plan should make similar use of intelligence to identify key areas of need within the capital. In the introduction to the draft plan we are told "The content of the Police & Crime Plan is informed by the best evidence around effective crime reduction and the strategy is built upon clear objectives to be achieved" but no mention is made of the analytical process undertaken to arrive at the priority areas outlined. This is the first time in a number of years the capital has had a crime reduction plan and the level and type of crime has changed significantly; LBN is of the view that this is an ideal opportunity to take stock of the changing crime and disorder landscape in London and address the issues accordingly.

The 20:20:20 Challenge appears to be at the core of the draft strategy. The 20% improvements in crime, confidence and costs form a challenging mandate in an extremely challenging public sector environment. LBN welcomes an aspirational focus on tackling crime which, despite effective partnership work between LBN and the Metropolitan Police remains a core priority for local people. However, it is our view that if the Mayor and Metropolitan Police make a commitment of this kind it must be deliverable. Promising undeliverable reductions in crime may in itself destabilise public confidence further.

London wide analysis would reveal crime patterns over the last 3-5 years and give a far better indication of what is realistically achievable. The subsequent 20:20:20 relating to criminal justice agencies is of significant concern, particularly in relation to the ability to deliver the outlined improved compliance with community sentences and reducing youth re-offending post custody. Whilst LBN is supportive of these goals, the current proposals to overhaul the probation system are, due to implementation timescales, likely to make any significant impact on compliance very difficult should they come to fruition in the short to medium term. Newham's Youth Offending Team works extremely hard to ensure that, despite having one of the largest caseloads in London, we maintain a re-offending average on a par with the

London average. A further 20% reduction on re-offending for those leaving custody would be an unrealistic expectation in our view, without increased resourcing, although we maintain a commitment to continually reduce re-offending.

With regard to simple packaging, we feel the use of the '20:20:20' strap line is conspicuously homogeneous, and naturally invites scrutiny of how the targets were arrived at.

In general, the draft plan remains silent on how the target driven approach sits with other government agencies - in particular the Youth Justice Board, HM Courts & Tribunals Service and National Probation Trust. LBN would ask that we receive confirmation that local areas will not be held to different sets of targets by different government agencies.

In terms of the priorities outlined, LBN feels the specific themed areas set out in the plan fit well with our local priorities, and those of a number of other East London boroughs. The recognition that gangs, terrorism, violence against women and girls, tackling the consequences of substance misuse, and improving sentencing outcomes, all require a specific and tailored local focus is welcome. However, it is important that the core MOPAC strategies are developed in line with local authorities to ensure the central approach is harmonised with wider community approaches. Any centrally imposed approach to gangs or the PREVENT programme will not be welcome or effective.

The strategy appears to put the previously familiar issues of volume crime on the same footing as the less well understood crime types and drivers. The prevalence of young people and women in Newham's violent crime figures provide more than sufficient evidence that greater emphasis, and greater resources are needed to continue to tackle the issues effectively. We have made an excellent start in restructuring how we provide support to women experiencing domestic violence but require further investment, such as a better resourced drop in facilities, to drive further improvements.

Through the Home Office's Ending Gang and Youth Violence funding stream we have built a strong programme of support for vulnerable young people but urgently require continuation funding, with fewer constraints, to ensure we can deliver the required approach. We look forward to working with MOPAC more closely on these, and other areas, once confirmation is received on funding criteria.

A significant area overlooked by the draft plan is the role of Community Safety Partnerships (CSPs). This is particularly significant given the Community Safety Fund will be merged with the main policing grant in 2014/15. The plan states that MOPAC will 'gain more responsibility for crime reduction in the capital and to control more of the funding provided for public safety in London'. It is not clear what the impact on CSPs will be as a result and how this fits into the localism agenda.

The draft Plan will also present difficulties for CSPs to make proposals/bids to reduce crime and disorder for their boroughs as it is very vague. Additionally, a number of specific strategies are yet to be written by MOPAC in the forthcoming year, e.g. Violence Against Women and Girls, Alcohol and Drugs, which would enable boroughs to have a greater understanding of the Mayors intentions and aspirations to address these issues. Whilst we welcome these s priorities, the publication dates for these will be later in the year and so without this detail, it is difficult for boroughs to provide informed bids or prioritise their own resources in the meantime without knowing the direction MOPAC plan to take on each issue. MOPAC state intentions of pan-London work such as commissioning a Domestic Violence Service, Director of Integrated Offender Management, Female Genital Mutilation taskforce and strategic licensing function. We would reiterate that details need to be publicised in good time to ensure boroughs can adequately prepare their bids for Community Safety Funding the next four years.

Mayor's Estate Strategy

LBN is very disappointed that MOPAC have earmarked two out five of our police stations for closure. Alongside the separately earmarked closure of Silvertown Fire Station, the closure of North Woolwich and Stratford Police Stations leaves Newham with a reduced emergency services offer and the borough has written to the Mayor of London direct to seek assurances on these issues.

Whilst we fully understand the reasoning behind “bobbies before buildings” we have not received sufficient reassurance that the proposals will not have a negative impact on local policing overall. There has been no assessment of the impact of these closures on emergency response rates or police presence within those areas, although we have requested this information from local partners.

Both the Royal Docks and Stratford are earmarked as significant growth areas and this must be factored into any decisions. For example in Stratford, where population is already dense and where we are expecting a significant growth in both business and population as a result of the opening of the Athletes Village for residents, the full operation of the Olympic Park and development of the wider E20 area. Also in the Royal Docks, which is one of the largest regeneration locations in London with over 250 hectares of developable brownfield land and more than 10,000 consented new homes, it is vital that this landmark new community for London has appropriate policing resources and in this context, the closure of a police station in such a key area is deeply concerning.

LBN is aware that the borough is set to receive 71 new police officers by 2015 and we welcome this. However, it is important to note that we have already lost 46 police officers since 2010 as result of cuts so the number of additional officers does not seem as significant as might first appear. During a community event in Newham in August 2012, the Metropolitan Police Commissioner said that resources would be allocated across London according to evidential formula taking into account the population and actual crime figures in an area. We would greatly welcome this

method of calculation as we know this is not the way resources are currently being allocated.

For example, if resources are to be based on actual crime figures and population, then a place like Newham, where the population is 308,000 (Census 2011) and just under 33,000 crimes reported last year alone (Met Police, 2012), should have significantly more resources compared to a borough like Richmond who have a population of just 187,000 and a total of just under 12,000 reported crimes in 2012. However, Newham are facing 2 closures in comparison to Richmond who face no closures.

We would therefore ask the committee to hold the Mayor to account with regards to resource allocation and to ask him to carry out assessments of the impact on police presence in local communities and emergency response rates to inform decisions about the total policing resources.

From: Andrea Casalotti
Sent: 14 February 2013 08:40
To: Claire Hamilton
Subject: Police and Crime Plan Review

I am surprised that road killing reduction is not one of the targets.

Last year 70+ pedestrians and 15 cyclists were killed by motorists.

The reduction of these killings should be a priority.

Andrea Casalotti

From: TOOLEY STREET
Sent: 09 February 2013 15:20
To: Police and Crime Committee
Subject:

Hi

What I want to see is Police actually policing on the streets of London. They are invisible and as such no deterrent to the bad people and no reassurance to the law-abiding majority.

What I also want to see is cyclists stopped from going through red lights, up one way streets, on the pavement, etc.

Regards, Vanessa

MOPAC – Police and Crime Plan 2013-2017: Call for Views

Three core elements of the draft plan aim to provide the drivers for reducing crime, improving police and criminal justice services for the public, and reducing reoffending – particularly with young offenders.

Mention is made about consulting local communities about their priorities that the police should address. Whilst the document states that the police alone cannot address all the issues raised in the plan, it is predicated on the basis that it can be solved almost exclusively within the statutory sector. There is no explicit recognition of the part that the voluntary, community and social enterprise sector (VCSE) can provide at the local and pan-London level to support the MPS in achieving the Mayor's key performance targets.

Two of the core elements are particularly relevant to VCSE's and the contribution that they can make towards positive outcomes -

Crime Prevention: This strand identifies effective partnership working as key to tackling the impact of drugs, gangs, violence against women and girls, and alcohol. No specific targets are set, but will undoubtedly contribute toward crime reduction figures.

Justice and Resettlement: The effectiveness of the wider criminal justice system is identified as critical to improved public safety in London. Three performance targets are set to reduce court delays by 20%; Increase compliance with community sentences by 20%; Reduce reoffending rates for young people leaving custody in London by 20% by 2016. A new London Director for IOM will have a £3.5m budget to improve resettlement support for young offenders leaving custody.

Opportunities

Cost savings and more effective partnership working are the key drivers for reform of policing and the wider criminal justice system. The draft Police and Crime Plan appears to be a missed opportunity for greater VCSE involvement in community safety, developing more innovative ways of reducing crime and improving Londoners' sense of well-being in their communities.

Development of more robust Integrated Offender Management systems built solely around compliance, rather than engagement, will not achieve the desired outcomes. Re-offending rates across the age range, particularly 16-24 years, remain stubbornly high. Innovative ways of engaging individuals within this group are needed. The aim for those delivering such a service must be to fully address the seven referral pathways widely acknowledged to reduce the likelihood of a person to reoffend.

National Government acknowledges that individual support for offenders released back into the community by properly trained staff will have a positive impact on reducing reoffending. Innovation is their recognition that the greater impacts can come from those who are ex-offenders involved in service delivery. Some London Boroughs already benefit from such a service with demonstrable good outcomes being achieved. Such partnership work rolled out across London will achieve the Mayor's aim to reduce reoffending rates for young people leaving custody in London by 20% by 2016. In the medium term, those partnerships will also contribute significantly to the aims of reducing key crimes by 20%; cut costs and improve public confidence in policing, as well as the wider criminal justice system.

From: Jessie Ben-Ami
Sent: 06 February 2013 16:06
To: Police and Crime Committee
Subject: Police and Crime plan feedback

Dear Sir/Madam

Thank you for the opportunity to comment on the draft Police and Crime plan.

My comments are focussed on the Stop and Search section. I support your current approach and would like to add one additional thought. The commonly expressed experience of the young people at Leap Confronting Conflict when being stopped is, as you note, feeling they are not being treated with dignity and respect. I am aware it is also true that that some young people being stopped and searched do not treat the officers with dignity and respect. Often the challenging or aggressive behaviour of one party triggers a strong reaction from the other party. I would suggest that workshops are delivered to both police officers and young people that share tools and techniques for dealing with challenging or aggressive behaviour when experienced during a stop and search. This would involve sharing a range of tools and techniques that can and reduce tension and de-escalate conflict situations. Participants can then be supported to trial these tools in role play enactments of typical stop and search situations.

If you would like to discuss this further then please do drop me a line

Kind Regards

Jessie Ben-Ami
Director of Delivery
Leap Confronting Conflict

London Police and Crime Plan 2013-2017

Barnardo's consultation response

15th February 2013

Dr Caroline Paskell, Barnardo's Strategy Unit,

Barnardo's welcomes the chance to inform the Mayor's draft Police and Crime Plan 2013-17. We are glad that the main priorities include giving victims a greater voice and helping London's vulnerable children. Likewise we are pleased that the Mayor has placed special emphasis on tackling violence against women and girls and serious youth violence.

However, despite highlighting these objectives, the Police and Crime Plan as currently drafted does not mention the need to tackle child sexual exploitation – criminal activity which impacts disproportionately on vulnerable children, especially young women and girls, and which is also known to be associated with serious youth violence. As recent court cases have shown, child victims of sexual exploitation have often found it incredibly difficult to be heard and to be protected effectively by law enforcement.

Whilst we understand that not all crime types can be highlighted, the Police and Crime Plan presents an important opportunity to improve policing awareness of and responses to child sexual exploitation. From our close work with police forces across the UK, we have observed that police are best able to respond to the needs of the victim and to tackle abusers effectively where the police force¹:

- identifies clear responsibility for tackling the issue at a senior level
- identifies or appoints officers with specialist knowledge
- ensures force-wide training on the issue
- has strong local multi-agency links
- has ways to identify child sexual exploitation on the local police database
- has a culture of support for young victims

The draft Police and Crime Plan creates chances to tackle child sexual exploitation more effectively on many of these points. We know that efforts are being made to focus on child sexual exploitation across the Metropolitan Police Service (MPS) as a whole, but we think that proposals to change the structure of borough allocations could undermine local efforts to understand and tackle this cluster of crimes, as "Small squads at borough level focused on narrow crime types will be disbanded" (page 9). It would be reassuring if the Community Safety Units, which will be retained, could take responsibility for gathering local information on this abuse and for supporting victims in the first instance – and if they were given appropriate training – before more specialist officers become involved. This could improve police support for young victims from the start and also facilitate within-borough and cross-borough policing responses to such exploitation.

We are glad that the draft Plan proposes to actively monitor policing performance on serious sexual offences, with the specific intention to "drive up reporting while driving down the incidence of crime" (pg.11). The commitment for the Mayor to publish crime data through the London Datastore on a monthly basis is welcome but we suggest that it includes some measure of the incidence or risk of child sexual exploitation. In time, it would be

¹ See Police and Crime Commissioners Checklist:
www.barnardos.org.uk/pcc_checklist_eng_final_pdf.pdf

beneficial for the MPS to develop a system for flagging known or suspected child sexual exploitation on the police database, as other forces do.

It is important that child sexual exploitation is always understood as a crime that affects both females and males. The Police and Crime Plan has a welcome focus on improving the safety of women and girls, but this could unintentionally detract from the very real sexual violence risks posed to boys and young men. The section on confronting gangs (page 13), for example, could also acknowledge the dangers of sexual violence faced by males and females who are in or on the fringes of gangs. However, efforts to tackle the threat of child sexual exploitation must not be overly focused on gangs as we know from our service users that children can be exploited whatever their background and peer set.

Barnardo's expertise

As one of the UK's leading children's charities, Barnardo's works directly with over 200,000 children, young people and their families every year. We run over 800 vital projects across the UK, including counselling for children who have been abused, fostering and adoption services, vocational training and disability inclusion groups.

Barnardo's has 24 specialist child sexual exploitation support services across the United Kingdom, one of which is in London. In 2011-12, through all of our services we worked directly with 1,452 young people and children at risk of or already sexually exploited (an increase of 22 percent on the previous year) of whom 120 were in London.

In London, Barnardo's has been providing specialist support on child sexual exploitation for 15 years. In 2005, we estimated that 1,002 young people were at risk of this abuse in London. Since the late 1990s we have had services in both north and south London and we now have a pan-London provision working with both male and female victims. Our work has been extensively evaluated and we are proud of the positive impacts that our intervention achieves. Evaluations of our work in South London (Eclipse, which was a multi-agency service co-located with police) and across London (the Recovery Project) can be provided and summaries are accessible here: www.londonscb.gov.uk/sexual_abuse/

A core part of our London work has been raising awareness of child sexual exploitation among children and young people as well as among professionals who work with them. We developed the B-Wise-2 Child Sexual Exploitation resource pack for engaging with young people on this issue. The resource pack formed the base for delivering our Child Sexual Exploitation Preventative Education Programme to 4,723 young people and 820 professionals across London, 2008-2011. The programme's delivery was evaluated very positively, with 98 percent of professionals stating they gained additional knowledge, and 62 percent of young people understanding better where to turn for appropriate support. The resource pack and the final evaluation report can be provided, and the latter can be accessed via the link: www.londonscb.gov.uk/sexual_abuse/

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Dear Deputy Mayor,

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The Draft Police and Crime Plan for London

In responding to this consultation, I would like to state from the outset that Camden does not agree with the fundamental premise which underpins this entire plan: that police budgets should be cut by 20%. In fact this not only underpins, but gravely undermines, the Mayor's Police and Crime Plan. I do not believe the aims of this plan, though often laudable, can be met with such a drastic cut to the resources of the Metropolitan Police.

As a large central London borough with a strong social mix, Camden is well placed to respond to this consultation. We have an extensive and positive relationship with the Metropolitan Police stretching back decades and would not like to see this relationship undermined. As we have highlighted in our formal response, various aspects of this plan threaten to detract from the gains which have already been achieved, particularly in terms of local engagement.

Though the Plan details a commitment to Neighbourhood Policing, this does not seem to be borne out by the reality of these proposals. In 2010, Camden's Safer Neighbourhood Teams had a total of 122 officers, sergeants and PCSOs, but by 2015, the total will be only 105 – that's a *cut* of 17 officers; a situation that would be even worse if we in Camden hadn't invested our own resources to support these teams.

I welcome efforts to make the police more accessible to the broader public, but there is a danger that pursuing 'police in post offices' *instead of*, rather than *in addition to*, front-desk operations. I think this will undermine many of the goals this plan sets out to achieve. For instance, this proposal does not seem to marry with the Mayor's simultaneously stated commitment to improving the reporting of traditionally under-reported crimes, such as sexual and domestic violence, or to encourage witnesses to come forward. I would like to seek assurances as to how this will be facilitated.

I welcome the commitment to further tackle the issues of sexual and domestic violence – crimes we know primarily victimise women. The scale of sexual and domestic violence is disturbingly high and demands urgent action. In particular, new ONS data obtained through FOI requests to the police shows that more could be done to tackle repeat victimisation. Additionally, rape crisis centres must be funded as a priority and should not be left in the precarious position that many have to date, facing an uncertain future.

Alongside the Mayor's aim to cut 20% from policing budgets is a commitment to cut the incidence of certain crimes by 20%. Whilst our concerns about the crime types chosen are detailed within our response, there is also the danger of a perverse logic that runs through all of this. If the police have fewer resources, with fewer police officers and fewer police stations, then surely this *must* have an impact on their ability

to effectively keep pace with and record crimes. If fewer crimes are recorded, it makes sense that crime figures look deceptively reduced.

Indeed the national figures back this up. As total police numbers have fallen by 11,500, figures released by the Home Office show that the proportion of crimes being solved by the police is also falling, with 30,000 fewer crimes solved in the last year, including 7,000 violent crimes against the person. In this context, the Mayor's third over-arching aim – to improve public satisfaction with the Met – seems implausible.

The police, alongside our other emergency services, are being put in a precarious position as a direct result of government funding cuts. Since 2010 the Metropolitan Police have lost around 1,500 police officers. In May 2010, Camden was served by a total of 884 police officers. By 2015, despite the commitment to Neighbourhood Policing professed in this plan, the number will be just 751 – a cut of 133 officers. Police levels are now at their lowest levels in more than a decade, and this proposal offers scant remedy.

Camden is being hit hard by these cuts. With West Hampstead, Albany Street, and Hampstead police stations all faced with closure, and Kentish Town seeing its hours reduced, Camden is faced with the spectre of having only one 24 hour police station serving the whole of the borough. With neighbouring boroughs also facing closures and reductions, this is playing fast and loose with the lives of Camden borough residents, and all the hundreds of thousands of visitors we host each day. For such a large, busy, central borough – a key transport route into the capital, and a top business, tourist and cultural destination – it should be patently clear this is grossly insufficient.

This, alongside the cuts to the other core emergency services, represents a reckless gamble with public safety. We have warned the government for some time that cutting police budgets by 20% will impact frontline policing, and their claim that frontline services can be left unaffected is clearly being exposed as disingenuous.

Our view is that the Government should urgently rethink the scale of police cuts and set out a proper plan for police reform instead. We will therefore be looking forward to hearing Lord Stevens report back from the Independent Commission into the Future of Policing, in the next few months.

Yours sincerely,



Cllr Sarah Hayward
Leader of the Council

Consultation Response:

To: The Mayor's Office for Policing and Crime (MOPAC)

From: Camden Council – Officer Response

Subject: The Draft Police and Crime Plan for London.

1. Introduction:

This response is based on the recognition of the financial pressures faced by all public services and on the understanding that as such all agencies are required to work differently making more effective use of reduced resources. The Mayor's Office for Policing and Crime (MOPAC) has outlined their responses to these challenges in respect of the Metropolitan Police Service (MPS) in the Draft Police and Crime Plan. This paper outlines comments and concerns on the proposals set out in the draft plan.

2. Background:

Camden Council is well placed to comment on the proposals. We have a long tradition of working closely with the Metropolitan Police Service (MPS) in order to tackle the crime and community safety concerns that matter most to our local communities.

The relationship has been particularly strong in a number of areas, which include:

- The creative use of antisocial behaviour (ASB) legislation particularly in successfully tackling problems such as the open drugs market that previously existed in the Kings Cross area.
- The pioneering "co-location" of our specialist domestic violence team (Camden Safety Net) at Holborn Police Station.
- The partnership approach taken to address issues relating to licensed premises.
- The council's support and commitment to the Safer Neighbourhood Panel structure and community engagement via groups such as the Camden Community Police Consultative Group (CCPCG).

Whilst we recognise the financial challenge MOPAC and the MPS face we are concerned that the Draft Police and Crime Plan for London will have a negative impact across many aspects of this historically positive relationship. These concerns are set out in more detail in the response below but we have also highlighted ways in which we can work together to continue our partnership working. We have also used this response as the basis for our submission to the London Assembly's Police and Crime Committee on the draft plan.

3. Safer Neighbourhood Teams & the future of Neighbourhood Policing:

MOPAC's on-going commitment to neighbourhood policing is positive. Maintaining front line visible resources will both be central to delivering the targets around reducing crime and increasing public confidence. However there are concerns around whether the deployment of the neighbourhood policing resources will have the desired impact.

The reduction in officer strength in the Safer Neighbourhood Teams (SNTs) to 1 Sergeant (a post shared in 8 of our 18 wards), 1 PC and 1 PCSO is a major concern. Council officers from a wide range of departments have built up strong local relationships with their ward based teams. There is a danger that the "operational memory and impact" of much of this will be lost within the proposed changes. A good example is the need for local police resources to continue to support the council and partners in the process of consultation, application and enforcement of ASB legislation. This will be especially pertinent given some of the proposed changes to these arrangements set out in the Home Office Draft ASB Bill.

However, our far greater concern in regards to the Draft Police and Crime Plan relates to how local communities can influence the work done by their local police resources. Currently ward based community panels set priorities for their SNTs, the proposed arrangements for local policing areas cut across this process and risk alienating residents, businesses and partners and thus severely undermining confidence in the police.

There is a risk that local police will no longer be able to focus on "quality of life" issues for communities such as problem premises, neighbour nuisance, street population activity and ASB. This will be a particular problem in areas where issues occur across local authority borders. This may mean that local police presence, reassurance and visibility will be lost, damaging perception and confidence, which is often unrelated to levels of crime. The capacity for local police to play a role in the development of restorative justice and the rehabilitation agenda will also be compromised. Given on-going concerns around youth disorder and serious youth violence we would ask that MOPAC include a commitment to maintaining designated police officers for schools in the Police and Crime Plan.

4. Proposed Changes to the Police Estate in Camden:

The need for public services to engage with residents and businesses in the most effective ways possible is central to their success. The proposal to establish alternative access points in locations away from police stations has merit in this regard and we want to work with MOPAC to explore opportunities around sharing buildings and co-locating officers to this end.

There is however a concern that the front counters being proposed for closure in Camden will have a disproportionate impact in the north and centre of the borough, especially in regards to Holborn Police Station being the only location that will be open on a 24 hour basis.

There is a risk that this will mean that communities in Camden are less likely to engage positively with the police, especially in terms of those crime types that are under reported in any case notably domestic violence, sexual violence and hate crime. We would like MOPAC to consider how its proposals will safeguard reporting from vulnerable individuals and communities. The closure of police stations and front counters will reduce

police visibility in our communities, thus reducing reassurance and undermining confidence. Communities will need to be reassured that there will be no impact on response times, as any reduction could mean that communities have less confidence in the police's capacity to respond to their needs when required.

5. The Future of Community Engagement with the Police:

The proposal to create Safer Neighbourhood Boards (SNBs) would undermine the current community engagement work structures in place in Camden. This is managed by our local Community Police Engagement Group (CPEG), which is called the Camden Community Police Consultative Group (CCPCG). The CCPCG itself is based upon the SNT panel structure, whose future is also unclear (see section 3 above).

There is an increasing concern about the vague nature of the plans in respect of the creation of SNBs and would ask for urgent clarity about and like to be involved in shaping the following issues locally:

- a) The governance arrangements,
- b) The role of local councillors,
- c) The funding arrangements for the boards.

6. Objective, Goals and Priorities:

The 7 "high impact, high volume" crime types that are listed in the draft plan as priorities for reduction would appear to have a clear focus on tackling the number of total notifiable offences (TNOs). There is a concern that this precludes a number of crime areas where there would be high risk victims, who may experience significant levels of harm, which include:

- Serious Youth Violence
- Domestic Violence
- Sexual Violence
- Vulnerable victims of ASB

There is also little emphasis on quality of life issues such as neighbour nuisance and other ASB. We recognise that a commitment reference is made to developing a second violence against women and girls strategy in summer 2013 but would welcome clarity on how the police will assist with the delivery of this.

Local priorities around these work areas are likely to remain in place and police support in delivering this will be of paramount importance. This will be more difficult if their resources are targeted at reducing TNOs.

This will also be the case across London especially in work areas where the Greater London Authority retains a focus.

We would ask MOPAC to re-consider the priority crime list in the light of the observations above.

7. Information Sharing with the Police:

Sharing information quickly and effectively has been a key element of the successful relationship between the council and the police. Centralising this function and thus removing local analytical support based in Borough Intelligence Units (BIUs) will have a significant impact on levels of communication between the local authority and the police, both strategically and operationally. This is especially worrying in regards to information in the immediate aftermath of critical incidents and will significantly reduce community confidence in the police as well as that of partner agencies. The local police analytical function is also a central component of the Community Safety Partnership in Camden, especially in terms of identifying local priorities around crime. The proposal puts this contribution at risk, and undermines the partnership's ability to allocate resources to tackle crime effectively, thus impacting negatively on reduction targets.



For women and children.
Against domestic violence.

21 February 2013

Refuge feedback on MOPAC Police and Crime Plan 2013-2017

Refuge welcomes the opportunity to provide feedback on the Mayor's Police and Crime Plan. We are encouraged that the plan includes strategies to tackle domestic violence, a horrific crime which affects women and children in all areas of the capital. We are, however, concerned about a number of details within the plan. These concerns are outlined below.

1. Lack of specific detail

Our overall concern is that the plan does not contain enough specific detail on indicators and targets. It would be helpful if the plan included a more detailed explanation of how, and by when, its objectives are to be reached.

Recommendation 1: Include a detailed action plan with specific indicators and targets for all objectives. Identify the team / individual responsible to ensure accountability and oversight.

2. Lack of clarification around domestic violence

There is a confusing lack of clarification about the position of domestic violence within the plan. The plan's "seven priority areas" (p.6) do not explicitly include domestic violence, but do include "violence with injury". Refuge is unclear whether domestic violence would fall within, or beyond, this category. We are concerned that the lack of clarification around the definition of domestic violence in the plan will lead to inconsistent recording of this crime, giving an incomplete and inaccurate picture of the scale of domestic violence in London.

Page 7 of the plan lists the "Crime Priorities" of the Mayor's 2012 re-election manifesto, including the intention to "Create a safer London for women". "Violence against women and girls" (VAWG) is specifically mentioned as an additional public safety concern. Given the Mayor's apparent concern over violence against women, Refuge is confused as to why domestic violence - or a broader VAWG category - is not included in the plan's overarching seven priority areas. We believe that 'side-lining' VAWG as an 'additional' concern will effectively allow it to slip through the cracks. Domestic violence accounts for 29% of violent crime in London². In the 12 months to August 2011, the police recorded 47,297 domestic violence offences in London³. Given the huge prevalence of this crime in the capital, Refuge is concerned by the relatively low – and confusing - profile of domestic violence in the plan.

Recommendation 2: Make domestic violence one of the plan's priority areas. Include an explicit definition of domestic violence within the plan and identify the categories (including sub-categories) under which data on domestic violence will be recorded. This should include the gender of the victim and perpetrator, and the relationship between them (eg. partner / ex-partner).

3. Cost-cutting and anti-bureaucracy measures

² Metropolitan Police Authority (MPA) Domestic and Sexual Violence Board (2010)

³ Chaplin, R. Flatley, J. and Smith, K. (2011) *Crime in England and Wales 2010-11*, London: Home Office.

Refuge is concerned by intentions to increase police efficiency by cutting paperwork. Page 9, for example, states that the Local Policing Model is key to “improving visibility and making sure the police are out fighting crime and not behind desks completing paperwork”. Refuge is pleased that Community Safety Units will be protected in the Local Policing Model, but we would welcome more information on how anti-bureaucracy drives may affect domestic violence policing. We note, for example, the recent ACPO pilot to cut paperwork by making domestic violence risk assessments ‘discretionary’⁴. Refuge is extremely concerned that similar efficiency drives from MOPAC may compromise the quality of the police response to victims of domestic violence.

References to cuts to “back office functions” (p.18) raise similar concerns. Refuge would welcome clarification on whether these cuts will include vital posts such as MARAC administrators, as our IDVA teams have already seen evidence of this at a local level.

Proposals to cut management and increase supervisory ratios are also worrying. A number of Independent Police Complaint Commission (IPCC) reports into domestic homicides have highlighted poor supervision as a recurring theme in police handling of domestic violence cases. Robust management and supervision of officers is vital to ensuring that vulnerable women and children receive a comprehensive, often life-saving response.

Recommendation 3: Protect vital police duties in relation to domestic violence, including risk assessment, safety planning and MARAC posts. Integrated risk assessment procedures that take into account the risks to both victims *and* their children should be developed. We would encourage MOPAC to consult with domestic violence specialists like Refuge *before* implementing efficiency measures that may compromise the quality of protection given to vulnerable women and children.

4. Under-reporting of domestic violence

Refuge is pleased that the plan specifically addresses under-reporting of domestic violence (p.15). Research suggests that only 23% of victims report domestic violence to the police⁵. Whilst we are encouraged that MOPAC intends to improve reporting mechanisms and increase access to reporting channels, we are concerned that the narrow emphasis on technological innovations detracts from the real reasons why abused women and children fail to report domestic violence. Last year, Refuge facilitated three focus groups with domestic violence survivors to inform the London Assembly report on victim satisfaction with the MPS. The report revealed significant problems with the MPS response to domestic violence victims which impacted on their likelihood of reporting crime. We include specific quotes from the report to illustrate this⁶:

- *“When I went to report at the police station, the Detective said: “you seem very intent on reporting this – so where’s the marks then?” I don’t think he believed me and he was very intimidating. “[I was] flustered, shocked and wanted to cry. You are a person in a position of authority and look how you’ve just treated me.”* Quote from a domestic violence survivor.
- *“Some victims of domestic violence reported that the police did not separate them from the perpetrator when asking what had happened. As a result, these victims felt unable to give a full and frank report of what had happened to them.”*
- *“The Committee heard examples of MPS officers failing to meet victims’ access or language support needs in an appropriate or timely way.”*

⁴ See Appendix 1 for Refuge’s response to the risk assessment pilot (which has now been discontinued).

⁵ Smith, K. et al. (2012) *Homicides, Firearm Offences and Intimate Violence 2010/11*. Home Office Statistical Bulletin 02/12. London: Home Office.

⁶ See pages 15-16 of *Duty of Care - improving support for victims of crime*, London Assembly report (2013)

- “Support organisations told the Committee about how prevailing police culture affects officers’ response to certain victims. Repeat victims of domestic violence, victims with mental health problems, victims who have previously withdrawn allegations and sex workers feel they are treated less seriously, and with less respect than other victims.”

Refuge believes that efforts to increase under-reporting of domestic violence must be much more focused on improving victim confidence and training officers to better understand the complex risks and dynamics of abuse in order to provide a more sensitive response to victims. All too often, abused women who make the extraordinarily brave decision to speak out against their abusers are met with apathy, disbelief and outright hostility. That the plan makes no mention of how to address this negative ‘canteen culture’ is highly worrying. Investing time and resources in improving public confidence in the police response must be prioritised over the development of technological innovations such as “smart phone crime reporting applications”. **Recommendation 4:** Create a clear strategy for improving the police response to domestic violence victims, in order to improve public confidence and increase reporting. This strategy must include provisions to improve and increase police training on the specific risks and dynamics of domestic violence.

5. Repeat victimisation

Refuge is pleased that the plan addresses the need to reduce repeat victimisation in key areas, including domestic violence. We are concerned, however, that no specific detail is included on how this will be achieved, beyond the claim that “robust programmes will be put in place” (p.15). Refuge would welcome clarification on what these programmes will entail.

The plan to “monitor incidents of repeat victimisation” is, of course, important - indeed, Refuge would argue that this activity should *already* be in place - but it must be complemented by specific, targeted methods of preventing abusers from perpetrating repeated violence. Given the complex nature of domestic violence, Refuge acknowledges that many interventions and policies will need to be adopted in order to achieve this, including – as above – improving the quality of domestic training given to frontline officers. All too often, officers regard domestic violence incidents as ‘one-offs’, failing to link patterns of abuse and identify risk factors. The failure to provide comprehensive, ongoing safety planning also leaves abused women and children vulnerable to further victimisation.

Recommendation 5: Identify and articulate specific policies aimed at reducing repeat victimisation. These policies must include improving the quality of domestic violence training given to officers, so that they are better equipped to identify risk factors and provide proactive safety planning designed to reduce the chances of repeat victimisation.

6. Prevention strategies

Refuge is encouraged that the plan includes a section on developing prevention strategies in key areas, including VAWG (p.22). Once again, however, there is a lack of detail about what these strategies will involve, beyond “partnership working” and “robust performance monitoring”. No mention is made of the techniques that might best deliver preventative action, such as high profile advertising campaigns aimed at challenging negative attitudes towards abuse. There is a particular need to undertake preventative work with children and young people affected by domestic violence – an area of work which is sorely overlooked and underfunded. Whilst Refuge supports the intention to deliver a coordinated community response to domestic violence, we would like to stress that multi-agency work is being undermined by ongoing funding cuts that are threatening the very existence of frontline services and key stakeholders. MOPAC must acknowledge that the domestic violence sector is under enormous

pressure to deliver 'more for less' in the current climate, and that prevention work must be the shared responsibility of all partners.

Recommendation 6: Articulate clear strategies for VAWG prevention work, including high profile awareness raising campaigns. Undertake preventative work with children and young people in schools and the wider community.

7. Commissioning

a. Refuge seeks further clarification on the specifics of the new "pan-London domestic violence service" (p.23), which will be commissioned and funded by the London Crime Reduction Board. We would also welcome the opportunity to work closely with the MOPAC commissioning board more widely, to ensure that the design and delivery of future services adequately reflects the needs of domestic violence victims. The current plan makes no mention of service user involvement in this crucial area. This is a serious concern, and Refuge would urge MOPAC commissioners to include women and children when planning services. It is essential that the voices of survivors are represented at all levels of the commissioning process.

Recommendation 7a: Commissioners must work closely with specialist organisations like Refuge to draw up domestic violence service plans and specifications. Undertake needs assessments to identify how frontline services will respond to local needs. Ensure that women and children are involved in this process.

b. Refuge understands that the new commissioning framework will be delivered through the Payment by Results model (p.27). We acknowledge the need to demonstrate service impact, particularly in this difficult financial climate. Indeed, Refuge has developed a highly sophisticated electronic system which enables us to monitor and evaluate our outcomes for women and children. We are, however, concerned that Payment by Results is not an adequate model for capturing the complex nature of domestic violence support work. Women and children who experience domestic violence have a diverse range of experiences and needs, requiring an equally diverse range of flexible and bespoke interventions. Broad aims such as 'safety' and 'empowerment' are likely to be delivered in complex ways, and may not fit easily into constraining outcomes frameworks. Multi-agency work, for example, makes it difficult to locate which agency is responsible for which outcome. Criminal justice outcomes for IDVA services can vary enormously depending on local contexts, such as whether there is a specialist domestic violence court. Service outcomes can therefore reflect a range of complex factors that the Payment by Results model does not adequately reflect. Payment by Results also requires organisations to take significant financial risks, since failure to achieve the desired results can result in reductions in payment. This disadvantages organisations like Refuge that lack financial stability as a result of ongoing austerity measures, and whose outcomes are significantly affected by a range of variables, as outlined above.

Recommendation 7b: Ensure that outcomes-based commissioning is flexible enough to reflect the complexities of domestic violence support work. Acknowledge that interventions for survivors of domestic violence do not always translate into neatly framed outcomes.

8. Compulsory sobriety

Refuge is concerned by plans to impose enforced sobriety on offenders through the Alcohol Abstinence Monitoring Requirement (AAMR) (p.28). Victims of domestic violence sometimes use alcohol and drugs as a means of coping with traumatic and prolonged abuse. Refuge is also aware that some perpetrators of domestic violence inform the police that the violence was mutual, or that the victim was the primary aggressor, which results in the victim being arrested. In some cases, women are arrested, cautioned or charged for using violence as a means of self-defence. We are therefore concerned that abused women may be penalised by enforced

sobriety regulations that do not acknowledge the specific factors underlying their alcohol dependency.

Recommendation 8: Ensure that the AAMR does not penalise victims of domestic violence with alcohol dependency issues. Ensure that magistrates receive training and/or guidelines to help them enforce the AAMR sensitively in cases involving domestic violence victims. Such guidelines could include information on referral protocols to specialist domestic violence / substance misuse agencies.

Summary of recommendations

1. Include a detailed action plan with specific indicators and targets for all objectives. Identify the team / individual responsible to ensure accountability and oversight.
2. Make domestic violence one of the plan's priority areas. Include an explicit definition of domestic violence within the plan and identify the categories (including sub-categories) under which data on domestic violence will be recorded. This should include the gender of the victim and perpetrator, and the relationship between them (eg. partner / ex-partner).
3. Protect vital police duties in relation to domestic violence, including risk assessment, safety planning and MARAC posts. Integrated risk assessment procedures that take into account the risks to both victims *and* their children should be developed. We would encourage MOPAC to consult with domestic violence specialists like Refuge *before* implementing efficiency measures that may compromise the quality of protection given to vulnerable women and children.
4. Create a clear strategy for improving the police response to domestic violence victims, in order to improve public confidence and increase reporting. This strategy must include provisions to improve and increase police training on the specific risks and dynamics of domestic violence.
5. Identify and articulate specific policies aimed at reducing repeat victimisation. These policies must include improving the quality of domestic violence training given to officers, so that they are better equipped to identify risk factors and provide proactive safety planning designed to reduce the chances of repeat victimisation.
6. Articulate clear strategies for VAWG prevention work, including high profile awareness raising campaigns. Undertake preventative work with children and young people in schools and the wider community.
7. a: Commissioners must work closely with specialist organisations like Refuge to draw up domestic violence service plans and specifications. Undertake needs assessments to identify how frontline services will respond to local needs. Ensure that women and children are involved in this process.

- b: Ensure that outcomes-based commissioning is flexible enough to reflect the complexities of domestic violence support work. Acknowledge that interventions for survivors of domestic violence do not always translate into neatly framed outcomes.
8. Ensure that the AAMR does not penalise victims of domestic violence with alcohol dependency issues. Ensure that magistrates receive training and/or guidelines to help them enforce the AAMR sensitively in cases involving domestic violence victims. Such guidelines could include information on referral protocols to specialist domestic violence / substance misuse agencies.

Appendix 1: Refuge's response to ACPO risk assessment pilots

Refuge is extremely concerned about the current pilot to cut police bureaucracy by making domestic violence risk assessments 'discretionary'. We have outlined our concerns below.

- The ACPO lead for reducing bureaucracy says the trial *'puts the emphasis on officers listening, understanding assessing and making proportionate decisions rather than filling in forms'* - but this fails to acknowledge that domestic violence risk assessment tools were first developed because frontline workers such as the police did not have the necessary training, knowledge and skills to make such assessments safely. Our experience at Refuge leads us to believe this situation has not changed much at all.
- Domestic violence is not a one-off incident, it takes place over time and it may be years before a woman calls the police. All the relevant facts about previous abuse and serious risk for future harm will not be immediately obvious when the police arrive at the scene - how will officers determine the complex risks faced by such victims if they do not carry out a basic risk assessment?
- Domestic violence risk assessment tools have been carefully crafted to give officers a format to check for risk factors that are not immediately obvious and can be easily missed. A properly completed risk assessment, coupled with a solid understanding of domestic violence, can help officers to identify those at high risk of serious, possibly lethal domestic violence, and ensure that they are protected.
- Last week the London Assembly released a report into victim satisfaction with the Met Police Service. This report highlights a range of serious concerns about the Met Police response to domestic violence victims – and this is deeply worrying. The police need to do *more*, not less, to protect victims of domestic violence. We need more and better specialist training for all police officers so that they can use the risk assessment tools effectively. This means *'listening, understanding assessing and making proportionate decisions'* about risk as well as *'filling in forms'*.
- We need to move beyond the 'check list' approach to risk assessment. Whilst the risk assessment tool is important, police forces need to actively engage in comprehensive, proactive safety planning for women and their children in domestic violence situations. At Refuge, we know that too many women and children are seriously let down by the police, sometimes with fatal consequences.

- The force trialling this new scheme says officers can disregard risk assessments at domestic incidents they judge not serious enough to merit one, and Refuge has sympathy with the example they present, in which the alleged perpetrator and victim are 'brothers arguing about a remote control'. But let's be clear, domestic violence risk assessments are designed to explore serious risk to victims from intimate partners or ex-partners - these victims are overwhelming female and their perpetrators overwhelmingly male.
- The right of women and children experiencing domestic violence to support and protection should not be threatened by the drive to cut bureaucracy in times of recession. Their safety should not be compromised by cost-cutting measures.
- Given the scale of domestic violence, Refuge acknowledges the need to prioritise or triage service responses according to need, but a focus on 'high risk' cases or discreet populations can mean that the majority of victims are ignored and vulnerable women and children fall through the gaps. *All* women and children who experience domestic violence, regardless of their 'risk level' deserve a range of high quality support services.



Only Connect

Response to MOPAC's Draft Policing and Crime Plan

1. What, if any, other objectives and goals would you add to the Mayor's objectives and goals?

Nil response.

2. What, if any, other things could be done to address police performance and resource issues?

Nil response.

3. Do you think the confidence in the Metropolitan Police needs to be improved? How do you think that could be done?

The trust in the MPS is possibly at an all time low given the significant and highly public investigations into corruption. This coupled with historic issues such as allegations of institutional racism have left the force in a challenging situation.

The public's confidence in the Police, along with other statutory agencies, is a key measure of both satisfaction and consent. It is necessary for the facilitation of effective crime reporting and detection, and a bi-product of professional and effective conduct of a police force.

More should be done on improving the root and branch professionalism and 'human touch' of police officers by making contact and placement in community settings a mandatory part of professional training and development. The risk is that beyond the neighbourhood policing model, there are too few opportunities for senior officers to ground themselves in the culture and expectations of the communities that they serve. This results in mistrust, miscommunication and poor outcomes.

On stop and search: the evidence of the effectiveness of stop and search in improving the sanction detection rate of crimes must be made publicly available to quell mistrust. Significant work should continue to go into the development of the quality of each of stop and search interactions, with the ability of the subjects to challenge this through formal complaints procedures being paramount.

4. The Mayor has prioritised keeping police officer numbers high rather than keeping underused buildings open. Do you feel that the focus should be on maintaining police numbers or police buildings? How else could budget savings be made?

Nil response.

5. What, if any, other things could be done to prevent crime?

The plan pays very scant attention to the different opportunities available to the Office for crime prevention activity. In particular, there is no detail on how the Office will conduct preventive activities with young people, especially those who are not yet coming to notice.

‘The Mayor must work with partners to prevent and tackle anti-social behaviour, crime and re-offending as well as protecting the vulnerable.’ It is difficult to disagree with this statement, however, the proposals do not enlist in any more than the role of ‘community safety and criminal justice’ in partnership with the police. We would argue that the role of communities and the voluntary sector is neglected.

This is underlined by the statement ‘empowering the public to support the police’: crimes are generated and experienced within communities first, with the police being significant professionals dealing with these issues, and so the consent and pull of communities is a pre-requisite for the police without which their job is not possible.

The target for reducing re-offending by young people leaving custody by 20% by 2016 may or may not be achievable and we would caution against binary targets for fear of creating perverse incentives. There has recently been speculation about the accuracy of police recorded crime statistics, so there is a risk that this plays into this skepticism.

The proposed £1m crime prevention fund to be created in 2014 by reforming MOPAC’s community engagement structures and recycling the savings is welcomed. It creates an opportunity for innovation since communities will be able to be involved directly in identifying and solving local problems. With that said, the prevention fund is balanced against the MPS budget of £4Bn, this is very insignificant. A more groundbreaking proposition could be to look at how savings from reducing crime through programmes can be re-circulated back to fund more prevention.

Education of young people in schools is an ever evolving and valid form of crime prevention. OC Impact, our schools programme has been proven to change attitudes towards anti-social behaviour among students who have taken part in it. Using qualified facilitators and trained ex-offenders, OC Impact aims to challenge attitudes about peer pressure, drugs, weapons, identity, difference and street culture and consequently can improve behaviour and learning.

6. What, if any, other things could be done to address justice and resettlement issues?

The argument for getting ex-offenders into work as a means for reducing offending is very attractive, however, the proposals give this issue very cursory exploration. While Job Centre Plus is the right partner, more needs to be done to understand how the training needs of offenders can be met systematically – to include job readiness – and beyond that, employers need to be lobbied to drop some of the prejudices and barriers associated with employing ex-offenders.

These barriers tend to be due to either ex-offenders’ criminal records or their lack of social skills. Therefore, job preparedness should be a mandatory component of

rehabilitation, developing softer skills. Our recently piloted Inspire programme, delivered in HMP Wormwood Scrubs, demonstrated the benefits of supporting prisoners in facilitation, presentation and public speaking, in some cases for the first time. Employers who have no experience of hiring ex-offenders are less likely to hire them and more likely to discriminate, whereas, employers who have experience have found that ex-offenders have a strong mindset and commitment.

The focus on evidence-based commissioning and payment by results is appropriate, but we would emphasise the need to intelligently explore further developments in what are relatively new concepts and methods, recognizing for instance that using binary reoffending rates as targets is not always appropriate.

7. What, if any, other key crime and safety issues that are important to you would you include?

Nil response.

8. Are there any other issues affecting you that have not been covered in the draft Police and Crime Plan?

The plan makes no mention of any non-statutory organizations other than Serco. This is a major omission of the work of individuals and charities who are supporting MOPAC's mission. There is an assumption that the statutory sector alone can work with communities. During 2012, the biggest concerns raised were anti-social behaviour; gangs; stop and search; and the relationship between young people and the police, but these are things that can be best dealt with through community responses, not statutory responses alone.

Safer School Officers need to be supported in their training and approach. Historically, they have been ill-used and ill-deployed with little science and purpose. There needs to be a better dialogue between police, educational establishments and service providers about the allocation of resources and the relative responsibilities in establishing safer school partnerships. Without this being structured and formalized, the Officers will not be used effectively.

Ambitions surrounding Payment by Results and Social Impact Bonds are right. However, it could be argued that the focus on statutory targets rather than actual human potential is limiting. Binary outcomes would not be welcomed as they are not necessarily ends in themselves. Only Connect has secured funding to conduct a feasibility study into the possibility for an area-based social investment vehicle in West London, which we will seek to discuss with MOPAC.

Finally, on the role of the voluntary sector, no mention is made of the Open Public Services agenda. If the voluntary or private sector can deliver the same services to the same level of accountability as local authorities, but at lower cost and with greater effectiveness, should this not be entertained in the way that MOPAC's funds are structured in the future? It might be that the public bodies have to lead, but could the bids be joint?

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18 February 2013

Dear Stephen

Draft Policing and Crime Plan

I am writing to thank you for coming to Leaders' Committee last week and to confirm the points that were raised in the discussion.

I hope you agree that the session was helpful in shedding light on the issues and opportunities that boroughs identified. In the event, most of the discussion focussed on the draft Policing and Crime Plan, which I think indicates that Leaders were largely content with the position we have reached on the London Crime Prevention Fund. I have appreciated your commitment to a collaborative approach to designing the Fund and hope that we will be able to build on this in the future. I should, however, mention one outstanding point that boroughs are concerned about; the potential for large fluctuations in funding from one year to the next. I would ask that you factor in some form of protection or damping to reduce any sudden swings or disruption in the commissioning process.

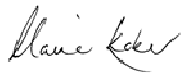
I know Leaders welcomed the opportunity to speak directly with you on the draft Police and Crime Plan and also value the extensive local consultation. I thought it would be useful to confirm some of the key points that emerged in discussion at Leaders and in preceding meetings:

- a broad welcome for the Mayor's commitment to crime prevention and the recognition of the important partnership role of councils;
- caution about the potential impact of changes to police numbers at ward level on public reassurance;
- a clear wish to retain visible policing across all areas of a borough, not just hotspots;
- some recognition of the business case for investing in officers rather than buildings, tempered by a call for reassurance that the estates reconfiguration will be implemented intelligently in close partnership with boroughs, to deliver better public access;
- a call for effective management of change and, in particular, for:
 - a. assurances that support services, such as Analysts and Coroners support officers will be maintained at an effective level throughout the process;
 - b. swift filling of vacant PC posts in under-strength boroughs.

- seeking reassurance that the transition to new police community engagement structures (Safer Neighbourhood Boards) will be progressed in a professional and timely way, avoiding prolonged uncertainty whilst building on local knowledge and experience;
- a broad welcome for the Plan's aspiration of influencing the broader criminal justice system, including probation and community pay-back;
- acknowledgement that the retention of Borough Commanders will make joint working more effective, tempered by concern about the downgrading of the rank certain Commanders, which may decrease their influence within the service;
- a clear wish to see borough Commanders remain in post for a minimum of two years;
- a call for a cultural change to empower Borough Commanders to operate with devolved budgets and decision making, to better facilitate tailored joint working with councils. This could usefully be coupled with a more granular approach to joint working, for example across specialist resources such as communications.

I hope these comments are helpful at this stage of developing in the Plan and I look forward to discussing the implementation at future meetings of the London Crime Reduction Board.

Yours sincerely

A handwritten signature in black ink, appearing to read "Claire Kober".

Claire Kober
London Councils Executive Member – Crime and Public Protection

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22 February 2012

Claire Hamilton
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Dear Claire Hamilton

Call for views response: The Mayor's draft Police and Crime Plan

The Howard League for Penal Reform welcomes the opportunity to respond to the London Assembly's call for views of the London's Police and Crime Plan. We have largely confined to ourselves to comments pertaining to our work on policing and young people.

About us

Founded in 1866, the Howard League is the oldest penal reform charity in the UK, campaigning for less crime, safer communities and fewer people in prison. We aim to achieve these objectives through conducting and commissioning research and investigations aimed at revealing underlying problems and discovering new solutions to issues of public concern. The Howard League's current work includes the U R Boss project, which works with children and young people in the criminal justice system.

Introduction

The Howard League has recently commissioned and conducted its own research on the treatment of children by the police. Our research in this area includes: *Out of place: the policing and criminalisation of sexually exploited girls and young women* (Howard League 2012a); *On our side: young people and the police* (Howard League 2012b); *Overnight detention of children in police cells* (Howard League 2011a); and *Life Outside: Collective Identity, Collective Exclusion* (Howard League 2011b). The charity also provides support to the All Party Parliamentary Group on Women in the Penal System that last year conducted an inquiry into girls in the penal system and included written and oral evidence from chief constables about the policing of young women. Two briefing papers were published as a result of this inquiry, *Keeping girls out of the penal system* (Howard League 2012c), and *From courts to custody* (Howard League 2012d).

In 2011, the Howard League for Penal Reform requested freedom of information (FOI) data from all police services in England and Wales. The data requested related to all children (aged 10–17) who had been arrested in the years 2008, 2009, and 2010, and was broken down by age, gender and ethnicity. A second request replicated the data for 2011. The Howard League response to the Police and Crime Plan is based on our analysis of these figures.

In addition, the Howard League's U R Boss project consulted over 60 young people from London who were in contact with the criminal justice system about their experiences with the police, their responses were overwhelmingly negative. This led us to deliver a campaign targeting Police and Crime Commissioners during the 2012 elections, emphasising the importance of consulting young people and improving relationships between young people and the police.

Child arrests

Children can be arrested by the police from the age of 10 years, the age of criminal responsibility in England and Wales. This is low in relation to other European countries that have an average age of criminal responsibility of 14 years (Cipriani 2009; Davies et al, 2005; Howard League, 2008). Wrongdoing by children in England and Wales is more likely to receive a criminal justice response than a welfare one (Jacobson et al, 2010: 1). Similarly, this forces a shift in the responsibility, for what can amount to 'naughtiness', away from parents and guardians into the remit of the state.

The treatment of children in the police station is anomalous. Generally a child within the criminal justice system is aged 10 to 17 years old, inclusive. However, in the context of the police station a 17 year old is treated as an adult. This means that they are not afforded the additional protections offered to children when they have been arrested such as having a parent or an appropriate adult present during interviews with the police. As this letter is being written the Howard League and Children's Legal Rights Centre are engaged in a judicial review of the failure to provide these protections to 17 year olds and a judgment is expected by summer 2013.¹

In the four years 2008–2011 there were 1,045,269 child arrests in England and Wales. While this is far too many, our analysis shows that year on year the number is falling. In 2011, there were 206,895 child arrests which was a third fewer than in 2008. The City of London Police Service saw a reduction in figures from 274 in 2008 to 192 in 2011. The Metropolitan Police Service saw a reduction in their figures from 49,292 in 2009, to 39,901 in 2011.

Arrests of girls

Girls accounted for around a fifth of all child arrests each year. Between 2008 and 2011, there were more than 200,000 arrests of girls. Following the downward trend in the overall number of child arrests there was a reduction of 44 per cent in the time period.

¹ The Howard League has applied to intervene in on-going judicial review litigation that has been brought by Just for Kids Law challenging this provision in the domestic legislation. Permission is due to be considered in February 2013 (*H.C. (a child, by his litigation friend C.C.) v. Secretary Of State For The Home Department and Commissioner Of Police For The Metropolis*; CO/7772/2012).

The Metropolitan Police Service saw a reduction from 7,694 arrests of girls in 2008 to 5,792 arrests in 2011. However, the City of London Police Service saw a 50% increase in the figures, albeit in small numbers, with an uptrend from 22 arrests of girls in 2008 to 44 arrests in 2011.

Implications of arrest

As the primary gatekeepers to the criminal justice system, the police therefore are the arbiters of who and how many people enter the system. An arrest has the potential to affect children's futures adversely in many ways, for example through future CRB disclosures that could result in an employment or university place being overturned. An inappropriate response to childish misdemeanours has significant resource implications for the police and other services as the process to arrest a child, quite rightly, requires more staff checks, particular conditions and access to more support (see Howard League 2011a for more information). Once arrested a child is more likely to go to court which in turn generates considerable cost to the taxpayer, much of it dealing with trivial matters that could have been managed safely by professional policing or children's services.

Policing practice

The young people we spoke to raised a number of concerns about policing practice, these fall into four general categories:

- **Quality of relationships:** The police are seen as not caring about or respecting young people
- **The 'usual suspects':** Young people felt that once they had been in contact with the police they became labelled as the 'usual suspects'
- **Racism:** In spite of some progress it is hard to counter that people of BME origin have more negative experiences and stop and search practices remain a concern for young people
- **Extreme examples of bad practice:** The blame for such practices may be due to a few rogue officers, but they must be rooted out and investigated as they discredit the whole police force

Police operate within parameters affected by legislation, policing priorities and targets, as well as local decision making and policing culture. In recent years, much has been made of the 'target driven' culture which may have led to the police focusing on 'low hanging fruit', which would include children. At its high point in 2007, Newburn (2011) suggested that over 240,000 children were sanctioned. This approach was described as a political arms race on custody and punishment whereby children were criminalised rather than supported or educated (Police Foundation 2010). To put it simply, it is easier to achieve a 'brought to justice' target by arresting a child caught stealing a sweet than by catching a professional burglar.

There is evidence that different policing areas have adopted markedly different policing styles (May et al 2010), which may illuminate why some police areas have different arrest rates. Some police forces are characterised by a professionalised 'rule of law' approach while others are more adversarial and personalised in style, placing less priority on respectful and fair treatment (ibid.: v). Police forces will also trade-off between reactive (i.e. responding to victim reports of crime) and proactive policing (i.e.

uncovering crimes in the course of policing). Research suggests that reactive arrests account for more young people entering the youth justice system than proactive arrests, for example two-thirds of arrests for acquisitive crime are a result of reactive policing (ibid.). Given the Mayor's focus on driving down crime by 20% in categories such as robbery and theft of the person, it is to be expected that policing efforts as regards these offences may well see increased contact between police officers and young people. This is an opportunity to think carefully about the police response to these crimes when children are involved.

The Association of Chief Police Officers (ACPO, 2010) acknowledged that enforcement is often a blunt tool and that punitive sanctions have little effect on reoffending. Instead ACPO suggests focusing on how the police might work with partner agencies and look to divert way from the need for police intervention.

The Legal Aid, Sentencing and Punishment of Offenders Act 2010 has made way for proposals to introduce more discretion and restorative justice. The application of this approach by the Metropolitan Police Service would help to reduce the number of child arrests and forge better relations between police, young people and the wider community.

Public confidence, particularly among groups that currently have low levels of satisfaction with the police, and neighbourhood policing

As we have detailed above, excessive rates of unnecessary and expensive arrests and regularly reported poor relationships between young people and the police reduce, not increase, public confidence in policing. At a time when budget cuts are a concern for all the knowledge that children and young people are being arrested and detained unnecessarily serves to reduce public confidence in policing plans.

As evidenced above, young people, particularly those who have had contact with the criminal justice system, are a key group that need to experience increased, demonstrable confidence in the police. To our knowledge the MOPAC consultation has not taken any steps to consult young people, engage young people through easy to access information or hold events to listen to young people's opinions. This is a significant failing in the consultation process. Furthermore, although increased confidence is an admirable target, there is very little about how this will be measured. Unless young people are explicitly involved in this measurement the outcome will be meaningless.

Young people's recommendation's on improving relationships with the police:

"...it all needs changing not just the officers but all of it and the ones at the top need to know what the officers on road are doing and how they are acting."

"Listen to us, it's not hard to see that the Police and the kids around here don't get on but what have they done to make a difference, harass us! Kids won't talk to the Police but that's because of how we get treated by them but there are others we talk to"

"Leave us alone, if we are robbing someone or causing trouble then yeah they should deal with that but when just hanging around or coming from centre just let us go about our business"

"They need to work for the community not the government, not all young people are criminals, not all black people are drug dealers, not all Muslims are terrorists if you don't know community you can't work with them"

"Be normal people...don't act like you always right and never make mistakes. Talk to people without an attitude and then maybe we can see they have some kind of respect for us"

"They need knowledge of that area so maybe before they join they should have to do youth or community work in that area. Then they may understand the problems people face and not just judge on people actions"

Justice reinvestment and payment by results

Finally, the Howard League notes the mention of payment by results in the Mayor's Police and Crime plan (Mayor of London 2013, p.27) and would highlight the success of the justice reinvestment pilots in five London boroughs (Croydon, Hackney, Lambeth, Lewisham and Southwark), which as the consultation notes has successfully reduced demand on the criminal justice system and seen £950,000 ploughed back into London communities to spend on further initiatives to reduce reoffending.

It is therefore of concern that the Ministry of Justice is proposing reforms to the probation service that would prevent the continuation and expansion of justice reinvestment initiatives. The Ministry of Justice plans to privatise the majority of probation work and utilise a narrow and more restrictive version of payment by results, introducing a national commissioning structure and a sub-prime model along the lines of the Work Programme. This is incompatible with justice reinvestment, which requires a local approach to enable a multitude of organisations to work together to reduce crime and demand on the justice system in particular communities, in the way that the London Crime Reduction Board is successfully doing.

We are keen to work with the London Assembly and the Metropolitan Police to improve the policing of children in the capital. Indeed I met with the Commissioner to discuss this today and have further meetings planned with senior managers in the Metropolitan Police to explore our recommendations.

Yours Sincerely

Frances Crook

Frances Crook
Chief Executive

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11th February 2013

Dear Joan,

Response to MOPAC Police and Crime Plan

Thank you for the opportunity to provide feedback in relation to this critical Plan for London. We feel that we have an excellent Safer Partnership which has for many years worked positively together to work towards a safer Lewisham and will continue to do so. Whilst the Plan is a step towards having identified priorities for London, we certainly would hope that local arrangements and the work that we have to date put into train will be supported to continue. In the work to date we have seen impact on a majority of our crime figures; less victims of crime, but also with our much broader approach to working with all key stakeholders in the criminal justice system and striving to support victims at court, to rehabilitating offenders and working to reduce demand on the system as a whole.

We have some specific areas which we feel are noteworthy.

Police stations / access and closures

You will of course have feedback on the issue of closures - whilst we accept the need for large budget savings to be made there is still the concern of locality and access for officers to local areas. There is concern that officers may be located at such a distance from the areas they serve that the notion of greater police numbers on Neighbourhood Teams may not actually be visible to the local residents.

There is clearly a concern that there is a feeling amongst local residents that the closure of public service buildings as a whole is symbolic and has feelings of loss and disinvestment.

Confidence in the police

We feel this is linked and should include confidence across the criminal justice system as a whole. Sadly the cuts in court services has already impacted on victims being supported through what often can be a difficult time in their lives. Delays in the system measure is welcomed however there is genuine concern about how this will actually be delivered. There needs to be much more of an active role across many more departments and agencies to ensure this area is given greater consideration than is currently the case.

There is clearly huge impact on confidence by the media. We feel it is important that greater consideration needs to be had (given?) in relation to this impact and to use the media to assist in delivering this difficult agenda.

Payment by Results

Whilst we have led the work in using PBR in Local Authority and within criminal justice and vulnerable groups, we have learnt significant lessons. We feel it is important that we are all held to account for delivering outcomes - but recognise that PBR is not the only way that better outcomes can be achieved. Before entering such a contract it is important to ensure that the voluntary and community sector are supported to be able to apply but also to deliver and that risk is clearly shared and not transferred. Significant consideration needs to be given to the measure and payment structure to avoid the obvious pitfalls of PBR, but also to balance out the administrative requirements with the cost and outcomes achieved. It is sad that a single vehicle for financing has been focused on when there are many other options and in fact very little evidence to date, despite many pilots, of the findings from these pilots.

You focus on delivering only on things we know work, however this not only stifles innovation but presumes we can continue to fund all the things that work. With the current financial situation there may need to be questions about what we stop delivering when we know it does make a difference.

General safety issues

It is not felt that there is sufficient focus on safety on public transport, particularly as it is the thing our young people comment on most as feeling unsafe. We would appreciate some greater focus on this with bespoke schemes for each borough dependant on issues such as adult to child ratio after school for example which is different for Lewisham than it is for other boroughs such as Westminster.

It is pleasing to see a focus on drugs and alcohol, we feel greater links to local structures such as the Health and Wellbeing board and public health would be helpful.

ASB is probably one of the greatest concerns amongst our residents however there appears to be very little in this area about a strategic approach.

Youth reoffending

A focus on youth is pleasing, however we are unclear as to why the reduction in reoffending is not for adults as well as for youth. In addition, we are extremely concerned that at a time when additional financial burdens are being placed upon the local authority in relation to remands there are expectations of this significant level of reduction.

We have concerns that there is very little regarding prevention and out of court disposals particularly the use of restorative justice.

Commissioning

This whole area seems very limited and late in terms of funding arrangements being made. It is of grave concern that such significant amounts of external funding for

boroughs is being treated in a way that does not appreciate the real impact on services, staff and above all service users.

Whilst there appears to be pledges towards victim services it is very unclear what commissioning of support services means in practice.

Whilst we are pleased that there is a commitment to 4 years funding, the rush in which bids have to be completed might not necessarily get the desired outcomes for the spend.

Whilst we are committed to joining funding streams, as we have a track record in doing, to get the best value for the collective funds, we are concerned about "match funding" - if this is a requirement for reviewing the funding this will pose difficulties in the current financial climate.

Public engagement

There are concerns about the transition from CPEG to Safer Neighbourhood Boards and how these will truly represent the local communities along with sufficient funding to support the work of the board.

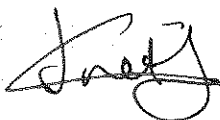
We feel significant work needs to take place to satisfy local communities about the remit and purpose of the new Board and how policing will be held locally accountable.

Performance

The rationale for the 20:20:20:20:20:20 targets would be useful to understand how we might be able to deliver on these, but also how further policing targets set by the Met would impact on this. Whilst we know all parts of the criminal justice system are linked if you were traveling through it as a perpetrator or a victim, it is not always clear how the individual performance indicators for each agency link nor work towards a joined up seamless system.

Lewisham will be working closely with MOPAC colleagues to deliver on the outcomes indicated, whilst continuing to undertake annual strategic assessments to better understand our issues and set local priorities which meet the needs of our citizens.

Yours sincerely,



Cllr Janet Daby

**Cabinet Member for Community Safety
London Borough of Lewisham**

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Date: 12 February 2013

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18 FEB 2013

Mr Stephen Greenhalgh
Deputy Mayor for Policing and Crime
City Hall
The Queen's Walk
More London
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Dear Mr Stephen

Draft Police and Crime Plan Consultation

Thank you for your letter regarding the above consultation, which I received on 15th January 2013. I appreciate Hackney Council being given the opportunity to comment on the Mayor of London's plans for policing and crime in London

I was pleased to read in the Police and Crime Plan 2013-2017 Consultation Draft document (herein draft plan) that the Mayor of London intends to place special emphasis on violence against women and girls, serious youth violence and business crime, and that domestic violence, rape and hate crime will be actively monitored.

I was also pleased to learn that efforts will be made to decrease Neighbourhood Crimes by 20% before the end of 2016. I am, however, disappointed that tackling gang related offences has not been included as a Neighbourhood Crime. It is strongly felt that police focus on gang related crimes, such as knife and gun crime, and serious youth violence at borough level may be inhibited if not included in the 20% basket.

With regard to the attempts to reduce crime by 20% over a 4 year period, I would be interested to know if this will be a universal target set for every borough, or whether previous performance will be taken into account. Between 2002/3 and 2011/12, Hackney saw a 44% reduction in seven priority crimes, resulting in 10,221 fewer victims of crime in the borough. This represented the second highest percentage reduction, and the second highest reduction in victim levels, in London. Between these dates, the 44% reduction was over one and a half times higher than the 28% reduction in London as a whole, and in the last four years alone this basket of crimes has fallen by 14% in Hackney, compared to 10% across London. In contrast many other London boroughs have reduced crime by significantly less, or have in fact seen increased levels of crime over the last 4 years.

It is worth noting that Hackney's reductions have been achieved in spite of a growing population. The 2011 Census indicates that the population grew by 20% between 2001 and 2011, with some areas experiencing growth of over 40%. Based upon the exceptional crime reduction already achieved in Hackney, there are reservations as to whether a further 20% reduction is realistic.

In terms of police officer numbers, October 2011 has been used as a baseline for each boroughs officer numbers. The draft plan does not explain whether the figures given reflect the number of officer posts allocated to the borough or the actual number of officers in posts across the borough, which can of course be above or below the allocated post number.

The 1,182 additional officers shown as allocated on page 10 of the draft plan, sees Hackney gain only 3 officer posts. Whilst the figures show that this is in keeping with most inner London boroughs, it puts Hackney at great odds with the increases in neighbouring boroughs. Newham and Waltham Forest will gain 71 and 119 Borough Officers respectively.

The only rationale given for the allocation process of additional officer posts is on page 9 of the draft plan, which advises that decisions have been 'based on analysis of demand and relative crime levels across London'. There is no explanation of what has been included in 'demand' or the timeframe for comparing crime levels. At the end of 2011/12, crime in Hackney was at a 13 year low, following a decade of sustained partnership activity to reduce crime. However, 10 months into the current performance year, Hackney has seen a 3% increase in total crime. The change in officer numbers would not seem to have taken this into account. The plan also does not explain how any future 'demand' increases will be taken into account. It is almost as if the allocation formula penalises historically strong performing boroughs, such as Hackney, and significant partnership investment to achieve that success.

Perhaps of greater note in this part of the draft plan is the significant difference in the police figures published for October 2011 and 2015, if compared with those published on the former MPA website for October 2011. The published figures, which are those supplied by the Metropolitan Police, show that in October 2011 Hackney had a total of 733 officers posted in the borough, meaning that by 2015 there would actually be a decrease of 48 officers. Similarly, across London in October 2011 the number of officers actually working in all of the boroughs was 19,229, not 18,103, resulting in just a 56 officer increase by 2015, not 1,182. The loss of officers in Hackney is even worse when comparing the 2010 average, which was 770 officers, with the 685 planned for 2015. This amounts to 85 fewer officers, or a reduction of 11% in police officer numbers comparing 2010 to 2015.

At the top of page 10 it states that 'to manage resource gaps, implementation will include a deployment plan for new officers and careful distribution of temporary abstractions to aid other boroughs or central London Operations'. Abstractions of officers to work off the borough will significantly affect boroughs, such as Hackney, that will not be gaining many officers.

Under the new deployment plan, new officers would be allocated proportionately to the vacancies, meaning that boroughs gaining large numbers of officers would be a higher priority for the posting of new officers from 2013-2015. Hackney, in comparison, would see an increase in its vacant posts (so have less actual officers) in 2013/14, and would only receive its three extra officers towards the end of the deployment plan, when most vacancies have already been filled across London. Hackney would also throughout the three years be called upon far more to provide

officers to leave the borough to fulfil the aid commitments referred to in the draft plan. Those officers will be abstracted from Hackney's Response and Neighbourhood Teams, thus reducing the number of officers for deployment in real terms.

Page 18 of the draft plan, which deals with cutting costs by 20%, outlines how constable numbers will be increased by reducing supervisory officer numbers. In Hackney this will reduce the number of Detective Inspectors from 8 in 2009 to just 4. This will also result in the loss of the Partnership Superintendent post and a Chief Inspector post in Hackney. Combined with additional requirements to have a senior officer on duty for 16 hours each day, there is a strong possibility that senior borough officers will no longer be available for partnership meetings, which over the last ten years have proven effective in decreasing the borough's crime rate.

With regard to Safer Neighbourhood Teams, the draft plan states that 'over 4,600 police officers will be directed to neighbourhood teams (currently approximately 2,000 officers work in safer neighbourhoods)', I am pleased to read that there is a commitment to every ward having a named sergeant, a dedicated named PC (who will not be abstracted) and a dedicated PCSO. However, if other PCs, PCSOs, MSC officers and volunteers are only to be brought in on a need basis, the minimum SNT model is in fact being decreased. Similarly, whilst I am pleased to read that Safer Schools officers will be retained for every secondary school that wants one, the draft plan does not make clear if this is a dedicated officer per school or a shared resource.

The draft plan states that each Neighbourhood Team will have a broader remit to cut crime, support victims and tackle offenders. It should be noted that whilst a Neighbourhood Team will include within its structure dedicated Safer Neighbourhood staff, a Neighbourhood Team is not just a cohort of Safer Neighbourhood teams. The broader remit will include the investigation of 'neighbourhood crimes', responding to calls that do not require a prompt response and will include other roles including partnership and offender management. Therefore, whilst the Neighbourhood Teams do involve additional officers working on a geographical basis, work that would have been done within now disbanded roles will come to the Neighbourhood Teams with the officers that join them.

In line with the Draft MOPAC/MPS Estate Strategy 2013-16, Hackney will retain a 24-hour front counter service at Stoke Newington, whilst Shoreditch will provide a daytime service and Hackney police station will close and be sold. However, the future of existing Safer Neighbourhood Team bases is not clearly explained. I would be interested to know whether these will be closed once the end of the property lease is reached.

The proposed methods for future public access to police, such as online, via the telephone, personal visits by appointment and providing a number of access points, do offer further possibilities for Hackney residents. In particular, Hackney Council would be interested in exploring the feasibility of a police public access point within our Service Centre.

With regard to the Safer Neighbourhood Boards, I note that by 2014 one will be set up in every borough, allowing the public a greater voice in establishing local policing and crime priorities. However, no details are given in the draft plan on matters such as membership of the Board, how a Chair will be selected and whether it would include elected members & other strategic partners. It also does not state how these priorities will accord with those set by the Community Safety Partnership, or those set

by MOPAC and the MPS. A lack of clarification suggests that there could be a risk of multiple conflicting priorities for police resources.

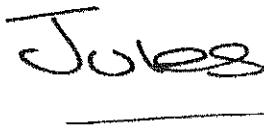
There have previously been announcements on reductions in police staff by 3,500. Whilst the draft plan repeats the commitment to reducing the number of police staff, it does not mention the figure for reduction in Hackney and whether this will include PCSOs.

I am pleased to read that the Community Safety Accreditation Scheme will be maintained for London, and that every borough will have a designated police LGBT liaison officer.

Finally, there are some items contained within the draft plan that were of particular interest to Hackney Council as a local authority. The intention to work with London boroughs to offer 50% Council Tax rebate to residents who volunteer to be Special Constables, is of course something about which I would welcome more information. Similarly, I would be keen to learn more about MOPAC's plans to develop alcohol related crime, drugs and anti-gangs strategies for London, the publication of the second violence against women and girls strategy this summer, and how the target of reducing re-offending by young people leaving custody will be met.

Thank you for the opportunity to comment on this consultation. I trust that MOPAC will find this feedback useful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jules', with a horizontal line underneath.

JULES PIPE
MAYOR OF HACKNEY

CC: Joanne McCartney AM, Chair of the Police and Crime Committee, London
Assembly, City Hall, The Queen's Walk, London, SE1 2AA



1. Introduction

Victim Support is comprised of four units: The Community Service; The Witness Service; The National Homicide Service and the National Supportline. Its major care is for the support of victims and witnesses so that the person victimised can remain functional through the trauma of crime and beyond. Our care also contributes to the prevention strategy as we can assist victims break the cycle of abuse and provide crime prevention advice and support. All elements of Victim Support's services are engaged with the Criminal Justice System extensively but we are a charity and we are not part of the Criminal Justice Service. Also, whilst we have close contact with Government, particularly but not exclusively, the Ministry of Justice, we are not part of a Government Department. This preamble is provided to put our comments into context.

Victim Support has in response to the Police and Crime Plan Consultation Draft restricted its comment to those issues that are likely to have a direct affect on victims and/or witnesses or on the services provided by Victim Support. We have used the nomenclature in the draft strategy for easy of reference in our reply.

2. Page 6 ~ The Mayor's Mission and Priorities

The Mayor's Mission and Priorities as described by the 6 bullet points are supported by Victim Support. We are pleased to see that victims are mentioned in bullet point 6. We feel that the mission and priorities might be enhanced by stating that the Mayor 'would ensure that victims received the support services they require to enable them to cope with the experience of crime.'

3. Ditto ~ London Crime Reduction Board

We would like to know how the voice of victims will be heard at this committee. We would also want to see how this relates to the London Criminal Justice Partnership, chaired by Assistant Commissioner Simon Byrne which does have representatives from the community thereon who can speak on behalf of victims of crime.

4. Page 7 ~ Crime Priorities

Victim Support is supportive of the five bullet points. Bullet point two 'Give victims a greater voice' resonates with our question in Paragraph 3 above.

5. Page 8 ~ The 20-20-20 challenge.

Victim Support is wholly supportive of any target that seeks to reduce crime as in doing so the number of people victimised is reduced. It also wishes to

see swifter and surer justice. There is a mismatch between reported crime and the crimes reported via the British Crime Survey. We are concerned particularly about young people, victims of hate crime, and of domestic and sexual violence. Improving reported crime in these areas should be considered carefully in any future strategy.

6. Pages 9/10 ~ Reforming the police model and keeping the police numbers high

No specific comment.

7. Pages 11~ Cutting Neighbourhood Crime by 20%

We are pleased to see that the focus will be on victim related crime. The acknowledgement of the impact of crime on victims in the five categories mentioned is welcomed.

8. Page 11/12 Counter Terrorism

No specific comment.

9. Page 12 Organised Crime

No specific comment.

10. Page 12 Taking business crime seriously

The incident of business crime, as it directly affects people, particularly small business (Fraud and theft has a greater impact here than on multi stores) has been neglected for too long. Victim Support is working with the National Fraud Office, Action Fraud and the City of London Police to design a support service for such victims. It will liaise with the MPS to see if it can support its strategy.

11. Page 12/13 Maintaining Public Order

We support these proposals. In the event of public disorder there is a Humanitarian response (Humanitarian Assistance Centres may be established). How is the need for these recognised and acted upon? For example Haringey established an HAC and Croydon did not. Liaison with London's Emergency Planning Teams will be important. Victim Support was instrumental in setting up the HAC in Haringey and were the designated agency for referrals once it closed. We have over 60 trained volunteers for such work.

12. Page 13 ~ Confronting Gangs

No specific comments.

13. Page 13 ~ Boosting Confidence by 20%

We support this proposal, particularly bullet point 3 and welcome the notion of a 'Safety Index'.

14. Page 14/15 ~ Improving Public Access

The move away from the primary use of the Victorian police counters as a means of reporting crime is good; however in taking the police service out into

the community consideration must be given to vulnerable victims who may be put at risk by having a police officer attend their home to take a report of crime. I am particularly referring to victims of DV and ASB who may be put a higher risk on repeat victimisation if they are seen to be engaging with the police. Victim Support readily accepts in this time of economic hardship that all members of society must make sacrifices. Generally speaking the most effective way of doing so is to reduce senior management and property. Victim Support in London has been through exactly the same process cutting its rent by c £160,000 over two years and its staff costs by £275,000. Whilst we are aware of the public's concern about the closure of police stations as part of a cost cutting exercise as they can be an important focal points to communities even if they aren't visited often. We consider that there are other ways of engaging with the public without having a police station as a nominal focal point for the community, particularly those that rarely visited police stations. Victim Support has offered its 12 main offices as focal points for the reporting of crime. We have CJSM and would be able to refer by that secure means. This could be accomplished electronically.

15. Page 15/16 ~ Supporting Victims and Witnesses

We look forward to the comprehensive analysis of victim support services that will take place during 2013/14. The Victim Service Advocates Report carried out by Victim Support and commissioned by Louise Casey when she was Victim's Commissioner is attached. This document, along with the document 'Kept in the Dark' has already been provided to the Deputy Mayor and the Chief Operating Officer. We agree entirely with the comments in the last paragraph of this section about 'witnesses'. As mentioned previously Victim Support is working with the MPS to design a service model that would provide witnesses with the appropriate support to improve attendance rates at court. Victim Personal Statements may be a method of improving victim engagement with the CJS and satisfaction with the service it provides. The provision of a VPS opportunity should be included in the review.

16. Page 16 ~ Stop and Search

No specific comment.

17. Page 16/17 ~ Policing with integrity – high professional standards

No specific comment.

18. Page 17 ~ Deaths in Custody

No specific comment.

19. Page 17 Building a police force that looks like the city it serves

No specific comment.

20. Pages 18/19 Cutting Costs by 20%

Our only comment is to say that where we can help to save money we are willing to help and support the MPS.

21. Page 20 Empowering the public to support the police

Victim Support is broadly in support of these proposals. We would be keen to be involved in the Safer Neighbourhood Panels. We have 1000 Londoners who volunteer for Victim Support to work in their communities to support victims of crime and witnesses in court. They have gained a considerable body of knowledge about the needs of victims and witnesses which Victim Support is willing to share.

22. Page 21 Boosting volunteers and growing the police family

No specific comment.

23. Page 21 Tackling crime hotspots

No specific comment.

24. Page 22 Using technology to design out crime

No specific comment.

25. Page 22 Crime on Transport

No specific comment.

26. Pages 22/23 Developing Prevention Strategies

No specific comment.

27. Pages 23 A safer London for women

Victim Support is very supportive of these proposals. As an aside, because it does not appear anywhere else in the strategy, we would ask that the issue of domestic violence against men which now forms approximately 20% of reported crime involving domestic violence and rising as men become more confident to report, should be included in the pan London service.

28. Page 24 Anti-Social Behaviour

No specific comment.

29. Page 24 Hate Crime

No specific comment except as mentioned above.

30. Page 25 Dangerous Dogs

No specific comment.

31. Pages 26/27 Justice and Resettlement

We have already commented on swifter justice and ineffective trials above. Evidence supports that where an offender recognises the impact their behaviour has on another person it reduces the likelihood of continued criminality. The Mayor should consider whether a Restorative Justice Scheme for London would help achieve the 20% reduction in recidivism target set by the strategy.

32. Page 27 Seeking swift and sure justice for victims

No specific comments except those expressed on this subject above.

33. Page 28 Payment by Results and Social Impact Bonds

No specific comments.

34. Pages 28/31 Reparation

Other than our comments about Restorative Justice 'an apology from an offender to a person victimised by crime can help recovery' we have no specific comment.

35. Pages 31/32 Rehabilitation

Other than our comment on Restorative Justice we have no specific comment.

36. Pages 32/33 Working with young offenders

No specific comment.

37. Page 34 Other elements of the plan

No specific comment.

38. Page 35 Performance and Accountability

No specific comment.

39. Page 35/36 Grants and Securing Services

No specific comment.

Jeff Gardner
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National Homicide Service
National Supportline