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14<sup>th</sup> May 2013

Dear Joanne

## **PCC Police and Crime Plan Consultation Report: Detailed Response**

I write in response to your letter requesting a more detailed response to the report the PCC published in March, as a consultation response to the draft police and crime plan. The table overleaf contains detail in respect of each of the recommendations.

As the Mayor noted in his letter to you on 25<sup>th</sup> March 2013, the Plan is the result of extensive consultation with Londoners and with partners. In arriving at final decisions, the Mayor has had to balance a series of competing priorities, as well as respecting the views of partners and of Londoners and needing to make some difficult strategic choices, in order to deliver the police service that Londoners deserve. The other challenge has been to ensure the balance of priorities is right. As you note in your report, "by definition, a high level strategy will not include details about dealing with every crime type".

My officials are currently building an implementation plan to ensure the successful delivery of the plan. I would be happy to share this with the PCC in due course.

Yours sincerely

Stephen Greenhalgh  
**Deputy Mayor for Policing and Crime**

<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
<p>1. In the final Plan, MOPAC must set out the evidence base used to develop the targets to demonstrate that they are appropriate – i.e. stretching but achievable. MOPAC should also demonstrate how it believes the targets can be met by including interim targets it expects the MPS to reach throughout the Plan period. MOPAC should provide the Police and Crime Committee with an annual report (by the end of March each year) on progress against this trajectory on each of the key performance targets, and an assessment of the impact of the Plan.</p>	<p>As noted in the letter from the Mayor to the Chair of the PCC on March 25 2013, the plan sets targets which MOPAC believes although stretching, are achievable. In that letter he also provides an explanation of why he believes interim targets would be inappropriate. MOPAC is more than happy to provide the PCC with an annual report including progress against those targets, but would suggest that it is delivered at the end of June each year so that full year figures can be included. Section 5 of the plan sets out how success will be measured.</p>
<p>2. To ensure that the figures being reported by the MPS accurately reflect Londoners’ experiences of crime and disorder, within the next six months MOPAC should work with independent experts to develop quality assurance mechanisms that can interrogate the information being provided by the MPS. It should report back to the Committee on this work by the end of September 2013.</p>	<p>Data accuracy is subject to review by the Directorate of Audit Risk and Assurance on an annual basis. MOPAC is also in discussion with HMIC about their on-going role in this area.</p>

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<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
<p>3. The final Plan must explain how MOPAC believes it addresses the issues that matter to Londoners and the priorities that are reported in the MPS's public surveys. It must include reassurance that significant public concerns that have not been included in the headline targets – including sexual violence and gangs – remain a priority. The final Plan should demonstrate that they will be adequately resourced and include the latest thinking on how performance will be assessed. The final Plan should also address the MPS's role in prevention of crime.</p>	<p>This is addressed in the Deputy Mayor's foreword in the plan, which outlines the results of the survey of Londoners, undertaken during March 2013. MOPAC is confident that the final plan addresses the issues that are of interest to Londoners, as reported by public surveys, even if those areas e.g. gangs and sexual violence do not have numerical targets attached to them. As noted in the plan, MOPAC and the MPS are agreeing a performance dashboard that will allow an assessment of performance in each area.</p> <p>The Police and Crime Plan highlights several strategies being taken forward either by MOPAC or by the LCRB. Crime prevention will be considered in each of these strategies.</p>
<p>4. The Committee welcomes the role that local forums currently play in determining local priorities and holding the MPS to account for performance. The final Plan should include a commitment to how these local engagement mechanisms will be supported in future and details of how they will be used to understand local concerns.</p>	<p>The plan proposes no change to the role of local ward panels in determining local priorities. The proposal for safer neighbourhood boards are being worked up and will be presented to the PCC in due course.</p>

<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
<p>5. In advance of implementing changes to neighbourhood policing, the MPS should publish details of how borough allocations were determined. This should include assessments of relevant pilots and explain how the lessons were used to develop London-wide plans for neighbourhood policing changes.</p>	<p>Details about how borough allocations were determined were outlined in the letter from the Mayor to the Chair of the PCC in March 2013, and in a letter from the Commissioner to the PCC following the PCC meeting in February 2013. There is also detail within the appendix of the plan. MOPAC is currently in discussion with London Councils and the MPS about how best to ensure there is a greater awareness at borough level about the allocation formula.</p>
<p>6. To manage some of the risks we highlight, the final Plan needs to:</p> <p>a) explain how the MPS believes the new model will strengthen neighbourhood policing;</p> <p>b) provide clarity on where additional resources will come from; and</p> <p>c) respond to concerns about the importance of locally known officers. The Commissioner should consider increasing the number of named and/or dedicated officers allocated to local areas.</p>	<p>MOPAC and the MPS fundamentally believe the new model will strengthen neighbourhood policing by more than doubling the number of resources allocated to it, and by giving local police leaders more flexibility about how those resources can be focused on tackling key local problems. Neighbourhood teams will be more visible than before, with more coverage in the evenings and at weekends and there will be fewer abstractions away from teams. Each local area team will be led by a named inspector and each ward will have a dedicated, named police officer and police community support officer.</p> <p>Borough policing has undergone a radical overhaul, with officers being redirected into frontline roles.</p>
<p><i>Using the British Crime Survey, the Committee will monitor visibility statistics and public awareness of safer neighbourhood teams to review the impact of these changes.</i></p>	<p><i>MOPAC is undertaking the same exercise in conjunction with reviewing PAS data on confidence at a local level.</i></p>

PCC RECOMMENDATION	MOPAC RESPONSE
<p>7. MOPAC and the MPS should look again at the proposal to cut PCSO numbers. The final Plan should demonstrate that this is the best option for dealing with the MPS's budgetary constraints and that there are no other less damaging areas for savings. Figures about borough allocations of PCSOs should be included in the final Plan along with details of police officer numbers.</p>	<p>MOPAC and the MPS recognise the value provided by PCSOs. However, a clear policy decision has been made to focus finite resources on police officers, based on the professional judgement of the Commissioner.</p> <p>In the new model, 2 PCSOs have been allocated per ward (i.e. 1260 in total), one of whom will be dedicated to the ward, with the other being part of the wider team working across the Local Police Area.</p> <p>In total, the police and crime plan aims to retain 2,310 PCSOs by 2015/16.</p>
<p>8. Within six months of the implementation of the new neighbourhood policing model, MOPAC should report to the Committee on its impact. This report should assess the impact on:</p> <ul style="list-style-type: none"> <li>• Effectiveness in tackling crime</li> <li>• Tackling anti-social behaviour</li> <li>• Community engagement</li> <li>• Public confidence</li> </ul>	<p>A letter from AC Simon Byrne (25<sup>th</sup> April 2013), forwarded by the DMPC gives further detail on the timetable for the roll out of the model. The Mayor has confirmed his willingness to meet this request, but has decided that a report in March 2014 would be more practical in order to allow sufficient time to assess the impact of the new model.</p>

PCC RECOMMENDATION	MOPAC RESPONSE
<p>9. MOPAC should ensure that the MPS honour its commitment to provide regular Operation Policing Measure analysis to the Assembly. This analysis would demonstrate the effect of changes to the police workforce – i.e. areas where civilian staff and supervisors are being lost.</p>	<p>MOPAC recognises the usefulness of this data and will ensure it is regularly provided.</p>
<p><i>The Committee will monitor these figures and hold the Mayor to account if it appears that his officer number commitment is affecting operational capacity, efficiency or safety.</i></p>	
<p>10. MOPAC needs to be able to assure itself and demonstrate to the public that supervision is adequate, not least to avoid high-profile damaging cases of officer misconduct. The final Plan should include a statement on the Mayor’s oversight of MPS supervision and reassurance that the proposed models are adequate.</p>	<p>The MPS is too top-heavy and has been for some years, particularly compared with other police forces. There are too many senior commanders and top management, and above average levels of supervisors at inspector and sergeant ranks, compared with other forces. The professional judgement of the Commissioner, supported by HMIC, is that the MPS needs fewer personnel at senior ranks and more PCs to bring the MPS in line with other similar forces. The operational mix of ranks and squads in the Met is at the discretion of the Commissioner. He wants the number of officers supervised by one sergeant to be more like other forces (1:6) as opposed to the current (1:4). MOPAC recognises the importance of supervision and will address this by e.g. holding the Commissioner account for delivery of high provisional standards, the delivery of ‘Total Professionalism’, and through the analysis of key professional standards and customer satisfaction metrics. The quality and nature of supervision is more important than the number of supervisors.</p>

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<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
11. In its final Estates Strategy, MOPAC should publish the criteria used to assess which front counters have been earmarked for closure. This will help to build confidence in the process.	A number of factors were taken into account when public access decisions were being made including the future use of the building (i.e. not just the front counter) and the fit with the wider estate strategy, accessibility and footfall. Further detail is provided in the MOPAC/MPS Estates Strategy, which was published on 20 <sup>th</sup> May 2013.
12. In advance of closing any front counters, MOPAC should conduct and publish a formal assessment of the impact of each closure and the adequacy of agreed alternatives. This will help to reassure communities that all implications have been identified and mitigated as appropriate.	Impact statements have been published on the MPS website for each borough.
13. MOPAC should ensure there is a period of reflection between the publication of the detailed proposals and changes beginning to be made on the ground. This would allow further local discussions - taking into account all of the changes e.g. to SNT bases - to ensure that any concerns are mitigated before changes are implemented.	MOPAC officers are working with the MPS to develop a schedule for closures and disposals. The delivery of this schedule will be monitored through the Joint Asset Management Panel and decisions taken by the DMPC to market for sale will continue to be published.

<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
14. The final Plan should address officer training and explain how MOPAC and the MPS will ensure that the training package adequately equips officers to deal with different needs of communities and individuals.	MOPAC recognises the importance of appropriate training. This will be addressed through the forthcoming MPS People Strategy and, as noted in the final plan, MOPAC will hold the Commissioner to account for the delivery of the strategy.
15. The final Plan should include far greater detail on the MPS's efforts to address community concerns around stop and search. This is a potentially positive opportunity for the MPS to demonstrate how it is responding to community concerns and yet none of this detail is included in the draft Plan.	There is considerably more detail in the final plan about how MOPAC will hold the Commissioner to account for the properly targeted use of stop and search. MOPAC notes the PCC's proposal to undertake an investigation into this area during 2013.
<i>The Committee will seek to bring greater transparency to the use of stop and search by investigating this topic later this year.</i>	
16. The final Plan should give details of the Commissioner's plans for recruitment of London residents, expectations of the impact of this scheme on diversity and a sense of what more will need to be done.	The MPS and MOPAC are developing proposals. These will be shared with the committee in the summer.



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<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
<p>17. The final Plan should set out how MOPAC intends to recruit a diverse membership to Safer Neighbourhood Boards that is representative of the local community and its diversity. It must provide greater clarity on the specific remit of the Boards and rethink their role as an intelligence gathering mechanisms for the MPS.</p>	<p>MOPAC notes the PCC's proposal to undertake an investigation into this area during 2013.</p>
<p><i>The Committee will seek to investigate progress in its investigation into community engagement and safer neighbourhood boards later this year, with a view to responding to MOPAC's consultation on safer neighbourhood boards.</i></p>	
<p>18. The final Plan should include a more comprehensive picture of the relative roles and responsibilities of partners in achieving the aims – i.e. an outline of who will do what and when to bring about improvements – developed through proper consultation with partners. Additional consideration needs to be given to the role of the voluntary sector and partners outside the criminal system, in particular. There are also serious questions regarding the justice and resettlement targets. MOPAC should therefore review the justice and resettlement section of the draft Plan.</p>	<p>MOPAC accepts this recommendation and is currently in discussion with partners about implementation plans. It is anticipated that a final plan will be discussed and agreed at an LCRB meeting later this year and will be shared with the PCC as appropriate after that meeting.</p>

<b>PCC RECOMMENDATION</b>	<b>MOPAC RESPONSE</b>
<p>19. The final Plan should provide much-needed clarity and details of the funding available to deliver the Mayor's priorities for community safety. MOPAC should address the concerns of local partners about the lack of information about MOPAC's strategic approach and how it will assess bids for funding.</p>	<p>Details on the London Crime Prevention Fund can be found at <a href="http://www.london.gov.uk/priorities/policing-crime/how-we-work/funding">http://www.london.gov.uk/priorities/policing-crime/how-we-work/funding</a>. The 'FAQs' section includes assessment criteria and how allocation decisions were made.</p> <p>A breakdown of funding decisions will be publicised via the MOPAC website in due course.</p>

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