

DMPC Decision – PCD 767

Title: Enhancing capability to respond to Indecent Images of Children in Frontline Policing

Executive Summary:

The MPS Indecent Images of Children (IIOC) project will enhance the ability of the MPS to investigate IIOC related offences through the creation of specialist Online Child Sexual Abuse and Exploitation (OCSAE) teams on every Basic Command Unit (BCU). These will provide a local specialist capability dedicated to IIOC investigations within BCUs, significantly boosting Frontline Policing's capacity and capability to investigate IIOC and deliver a service that is more responsive to safeguarding children in London.

The first part of the project (Phase One) has been implemented with the 12 BCU OCSAE teams mobilised in January 2020 with funding up until the end of March 2020. This report notes funding of Phase One and further funding to support phase Two of the IIOC project and will cover the agreed officer posts, specialist IT support and training and officer welfare throughout 2020/21.

Recommendation:

The Deputy Mayor for Policing and Crime is asked to:

1. Note the funds released for Phase One of the IIOC project (£1,622,000 in 2019/20) from approved MPS budgets.
2. Approve the release of £5,197,450 for 2020/21 for Phase two of the IIOC project. The funds are from within existing approved MPS budgets.

Deputy Mayor for Policing and Crime

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

The above request has my approval.

Signature



Date

29/05/2020

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

1. Introduction and background

- 1.1. Over recent years the MPS has recorded a huge increase in the number of offences relating to indecent images of children (IIOC), which include taking, making, possession and distribution of indecent images. In 2016 an average of 96 offences per month were recorded. In 2019 this average figure stood at 217 per month.
- 1.2. Over a similar timeframe Her Majesty's Inspectorate of Constabulary Fire and Rescue Services (HMICFRS) has provided a critical look at the MPS's child protection processes, first in 2016 and subsequently in 2018, resulting in a series of recommendations aimed at improving our service and protection of at risk children.
- 1.3. It is against this backdrop of growth in demand for MPS services and a need to enhance our operational response in order to safeguard victims and bring offenders to justice that the IIOC project was established. The project seeks to build on existing specialist capacity within the Met to investigate these offences through the establishment of a specialist Online Child Sexual Abuse and Exploitation (OCSAE) team within every Basic Command Unit (BCU) in the MPS with the aim of: transforming MPS performance in protecting children from the threat of online abuse and exploitation generated by the demand for IIOC; and transforming MPS performance in bringing IIOC offenders to justice.
- 1.4. Funding for the IIOC project has already been identified within Frontline for an uplift in policing services in 2020/21. The Chair of the Portfolio and Investment Board approved the release of £1.62m for Phase One in December 2019. This enabled the mobilisation of the 12 BCU OCSAE teams, supporting the uplift of 60 officer posts to a total of 108 BCU posts, and allowing for the provision of OH support, training, estates and IT equipment to the officers to the end of FY 2019/20. These teams went live on 6th January 2020.
- 1.5. Now that the teams are live, Phase Two of the IIOC project seeks approval for the further release of funds (£5.19m) as we move towards a position of fully embedding enhanced IIOC capability. This will principally be achieved through continued funding of the agreed officer posts and provision of IT support to investigations, together with necessary training and welfare support for officers.
- 1.6. Dependent on the funding decision that would deliver Phase Two, the MPS plans to conduct a full evaluation of the BCU OCSAE teams in April 2020 over approximately six-months (Phase 3).

2. Issues for consideration

- 2.1. The IIOC project directly addresses one of the three priority areas identified in the Mayor's Police and Crime Plan; keeping children and young people safe, and in doing so it recognises the challenges to child protection as illustrated by HMICFRS. The IIOC project is a necessary element of the MPS approach to tackling these crimes and the

Met's 'Met Direction' strategy is squarely focused on preventing high-harm offences and protecting those at most risk and pursuing the most dangerous criminals. The strategy also prioritises the enhancement of digital skills and capabilities across the board. With an increasingly complex digital environment this is a key factor to enhancing our response to IIOC.

- 2.2. Phase Two is critical to the success of the IIOC project. Continued funding of the officer posts is a key factor, but a critical dependency in terms of investigation capability is the provision of the full digital solution to provide officers with the tools and equipment to most effectively manage data, intelligence and evidence. As the BCU OCSAE teams bed in, this is being supported through a combination of the central OCSAE team and Forensic Services. This investment in IT support and training for the BCU OCSAE teams will provide the infrastructure necessary to enhance MPS performance through an investigation model that bears down on the level of IIOC offending and brings offenders to justice wherever possible and practical.
- 2.3. Minor estate refurbishment will need to be carried out in four BCUs to provide a dedicated secure operational environment for the OCSAE teams in these BCUs. Property Services have been consulted as part of this business case and are fully supportive of this proposal.

3. Financial and Commercial Comments

- 3.1. The overall costs for Phase One of the IIOC project were:
 - Officer pay costs - £816,000
 - Officer support costs - £81,000
 - Project costs - £133,000
 - Equipment, Estates and Training - £592,000
- 3.2. The Phase One costs have been agreed by Finance and Portfolio Investment Board, this is a retrospective request for noting.
- 3.3. The overall costs for Phase Two of the IIOC project are broken down as follows:
 - Officer pay costs - £3.6m
 - Officer support costs - £200,000
 - IT support, OH and training - £1,097,450
 - Estates - £300,000
- 3.4. Prior to the approval requested in this paper, the IIOC Project Executive has agreed that this expenditure represents value for money and it has further been approved by the Strengthening Local Policing Programme Board and Portfolio Investment Board (PIB). Finance has confirmed affordability of £5,197,450 for IIOC from funding allocated to Frontline Policing for FY2020/21. Commercial are content with the procurement route, and as an extension to an existing service this work does not change any aspects relating to responsible procurement.

- 3.5. Funding is within approved MPS budgets, confirmed by Finance.

4. Legal Comments

- 4.1. Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime (DMPC) has delegated authority to approve business cases for revenue or capital expenditure of £500,000 or above.
- 4.2. The Mayor's Office for Policing Crime is a contracting authority as defined in the Public Contracts Regulations 2015 ("the Regulations"). All awards of public contracts for goods and/or services valued at £189,330 or above will be procured in accordance with the Regulations. Commercial services have confirmed that this proposal is compliant with commercial regulations.

5. GDPR and Data Privacy

- 5.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
- 5.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
- 5.3. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the service meets its compliance requirements. The project does not use personally identifiable data of members of the public, so there are no GDPR issues to be considered.

6. Equality Comments

- 6.1. This business case has undergone initial equality screening. Due regard has been taken to the Equality Act's Public Sector Equality Duty. Real consideration has been taken to assess equality impact caused by the proposed business changes. As this is an extension of an existing service this work does not change any aspects relating to equality or diversity.
- 6.2. It will have a positive impact on children and young people, both those that are victims or are vulnerable to becoming victims. The MPS has also taken consideration of the impact on offenders; providing guidance to officers on welfare and risk assessment for those people that are arrested for IIOC offences.

Public access to information

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

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

Part 1 Deferral:

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

If yes, for what reason:

Until what date: N/A

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

Is there a **Part 2** form – Yes

ORIGINATING OFFICER DECLARATION*Tick to confirm statement (✓)***Financial Advice**

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

Legal Advice

The MPS legal team wrote this proposal.

Equalities Advice:

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

Commercial Issues

The MPS Commercial team have been consulted on the commercial issues within this report. The proposal is in keeping with the GLA Group Responsible Procurement Policy.

GDPR/Data Privacy

- GDPR compliance issues are covered in the body of the report
- A DPIA is not required.

Director/Head of Service

The Head of Workforce and Professional Standards has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.

Chief Executive Officer

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

Signature**Date** 27/05/2020

Rationale for the release of funds allocated from Frontline to the IIOC Project for enhancement of IIOC capability in Frontline Policing

MOPAC Investment Advisory & Monitoring meeting, 2nd April 2020

Report by DAC Amanda Pearson on behalf of the Chief of Corporate Services

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

EXECUTIVE SUMMARY

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The first part of the project (Phase One) has been implemented with the 12 BCU OCSAE teams mobilised in January 2020 with funding up until the end of March 2020. This report seeks approval for further funding to support phase Two of the IIOC project and will cover the agreed officer posts, specialist IT support and training and officer welfare throughout 2020/21.

Recommendations

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

- 1. Note the funds released for Phase One of the IIOC project (£1,622,000 in 2019/20) from approved MPS budgets.**
- 2. Approve the release of £5,197,450 for 2020/21 for phase two of the IIOC project. The funds are from within existing approved MPS budgets.**

Time sensitivity

A decision is required from the Deputy Mayor by 16 April 2020. This will allow the continuation of the full enhanced IIOC investigation capability within Frontline Policing. It will also allow the placement of contracts with external suppliers to deliver specialist digital and investigative training.

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

1. Introduction and background

- 1.1 Over recent years the MPS has recorded a huge increase in the number of offences relating to indecent images of children (IIOC), which include taking, making, possession and distribution of indecent images. In 2016 an average of 96 offences per month were recorded. In 2019 this average figure stood at 217 per month.
- 1.2 Over a similar timeframe Her Majesty's Inspectorate of Constabulary Fire and Rescue Services (HMICFRS) has provided a critical look at the MPS's child protection processes, first in 2016 and subsequently in 2018, resulting in a series of recommendations aimed at improving our service and protection of at risk children.
- 1.3 It is against this backdrop of growth in demand for MPS services and a need to enhance our operational response in order to safeguard victims and bring offenders to justice that the IIOC project was established. The project seeks to build on existing specialist capacity within the Met to investigate these offences through the establishment of a specialist Online Child Sexual Abuse and Exploitation (OCSAE) team within every Basic Command Unit (BCU) in the MPS with the aim of: transforming MPS performance in protecting children from the threat of online abuse and exploitation generated by the demand for IIOC; and transforming MPS performance in bringing IIOC offenders to justice.
- 1.4 Funding for the IIOC project has already been identified within Frontline for an uplift in policing services in 2020/21. The Chair of the Portfolio and Investment Board approved the release of £1.62m for Phase One in December 2019. This enabled the mobilisation of the 12 BCU OCSAE teams, supporting the uplift of 60 officer posts to a total of 108 BCU posts, and allowing for the provision of OH support, training, estates and IT equipment to the officers to the end of FY 2019/20. These teams went live on 6th January 2020.
- 1.5 Now that the teams are live, Phase Two of the IIOC project seeks approval for the further release of funds (£5.19m) as we move towards a position of fully embedding enhanced IIOC capability. This will principally be achieved through continued funding of the agreed officer posts and provision of IT support to investigations, together with necessary training and welfare support for officers.
- 1.6 Dependent on the funding decision that would deliver Phase Two, the MPS plans to conduct a full evaluation of the BCU OCSAE teams in April 2020 over approximately six-months (Phase 3).

2. Issues for consideration

2.1 Phase Two is critical to the success of the IIOC project. Continued funding of the officer posts is a key factor, but a critical dependency in terms of investigation capability is the provision of the full digital solution to provide officers with the tools and equipment to most effectively manage data, intelligence and evidence. As the BCU OCSAE teams bed in, this is being supported through a combination of the central OCSAE team and Forensic Services. This investment in IT support and training for the BCU OCSAE teams will provide the infrastructure necessary to enhance MPS performance through an investigation model that bears down on the level of IIOC offending and brings offenders to justice wherever possible and practical.

3. Contributes to the MOPAC Police & Crime Plan 2017-2021¹

3.1 The IIOC project directly addresses one of the three priority areas identified in the Mayor's Police and Crime Plan; keeping children and young people safe, and in doing so it recognises the challenges to child protection as illustrated by HMICFRS. The IIOC project is a necessary element of the MPS approach to tackling these crimes and the Met's 'Met Direction' strategy is squarely focused on preventing high-harm offences and protecting those at most risk and pursuing the most dangerous criminals. The strategy also prioritises the enhancement of digital skills and capabilities across the board. With an increasingly complex digital environment this is a key factor to enhancing our response to IIOC.

4. Financial, Commercial and Procurement Comments

4.1 The overall costs for Phase One of the IIOC project are broken down as follows:

- Officer pay costs - £816,000
- Officer support costs - £81,000
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- Equipment, Estates and Training - £592,000

4.2 The Phase One costs have been agreed by Finance and Portfolio Investment Board, this is a retrospective request for noting.

4.3 The overall costs for Phase Two of the IIOC project are broken down as follows:

- Officer pay costs - £3.6m
- Officer support costs - £200,000
- IT support, OH and training - £1,097,450
- Estates - £300,000

4.4 Prior to the approval requested in this paper, the IIOC Project Executive has agreed that this expenditure represents value for money and it has further been approved by the Strengthening Local Policing Programme Board (31 Jan 2020).

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

Finance has confirmed affordability of £5,197,450 for IIOC from funding allocated to Frontline Policing for FY2020/21. Commercial are content with the procurement route, and as an extension to an existing service this work does not change any aspects relating to responsible procurement.

5. Legal Comments

- 5.1 Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime (DMPC) has delegated authority to approve business cases for revenue or capital expenditure of £500,000 or above.
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6. Equality Comments

- 6.1 This business case has undergone initial equality screening. Due regard has been taken to the Equality Act's Public Sector Equality Duty. Real consideration has been taken to assess equality impact caused by the proposed business changes.
- 6.2 As this is an extension of an existing service this work does not change any aspects relating to equality or diversity. It will have a positive impact on children and young people, both those that are victims or are vulnerable to becoming victims. The MPS has also taken consideration of the impact on offenders; providing guidance to officers on welfare and risk assessment for those people that are arrested for IIOC offences.

7. Privacy Comments

- 7.1 The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
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- 7.3 The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
- 7.4 The project does not use personally identifiable data of members of the public, so there are no GDPR issues to be considered.

8. Real Estate Implications

8.1 Minor estate refurbishment will need to be carried out in four BCUs to provide a dedicated secure operational environment for the OCSAE teams in these BCUs. Property Services have been consulted as part of this business case and are fully supported of this proposal.

9. Environmental Implications

9.1 There is no environmental impact arising from this report.

10. Background / supporting papers

10.1 Supporting papers are in Part 2, which is exempt from publication.

Report author: Lisa Cameron, IIOC Project Manager 07467 147091

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

The Government Security Classification marking for Part 2 is:

OFFICIAL-SENSITIVE [COMMERCIAL]

Part 2 of the Indecent Images of Children Business Justification Paper is exempt from publication for the following reasons:

- Exempt under Article 2(2)(c) of the Elected Local Policing Bodies (Specified Information) Order 2011; and
- Freedom of Information Act 2000 Section 31 Law Enforcement and Section 43 Commercial Interests

The Business Justification Paper will cease to be exempt at the completion of the contract.