Councillor Ruth Dombey

London Borough of Sutton
Leader of the Council
Liberal Democrat Councillor for Sutton North Ward

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Dear Stephen

MOPAC Police and Crime Plan for London

Thank you for visiting Sutton with Assistant Commissioner Byrne to talk about your plans to combat crime and disorder across London and in Sutton in particular.

This letter together with the detailed appendix forms the formal comment from the London Borough of Sutton. It is based on feedback from our Cabinet, Scrutiny function, Community Safety partnership and Community Police Engagement Forum, and of course our residents. Our public meeting was well attended and this is reflective of the priority that is given to such issues in Sutton. Tackling crime and disorder is our residents' number one priority.

- We were pleased to hear your commitment on behalf of MOPAC and the Metropolitan Police Service (MPS) to continue to support our highly successful Safer Sutton Partnership Service. We take this to include key components of single line management integrating Police and local authority staff, a jointly appointed Head and commissioned services such as Safer Parks Police and CCTV monitoring.
- The priorities you set out against a background of reducing expenditure are clear and the aims of the plan laudable. However while gang activity is a problem in some London Boroughs it is by no means the experience of most. Tackling this issue is a priority

where it occurs but we should avoid raising fear where such problems don't exist.

- The plan proposes the closure of public access at Crosspoint House, Wallington. Given the investment in the building we ask you reconsider this. We remain keen to work with you in identifying new access points in the Borough.

Otherwise our concerns over the plan refer to areas where it is silent or potentially misleading:

- The plan offers targets but no method of delivery other than a refocusing on neighbourhood level investigation. This could result in more recorded crime with less sanctions and detections. We would like to see an increased emphasis on engagement, reassurance and prevention which appear to be missing at the moment.
- The plan gives an impression that police numbers will increase. In actuality numbers of constables will increase while, PCSOs, civilian staff and supervisory ranks (from Sergeants and above) will decrease. The plan offers one PC and one PCSO per ward with a locally accountable Inspector. Currently we enjoy three PCSOs, two PCs and one Sergeant per ward with a locally accountable Inspector. While you assert there will be more personnel on wards you have offered no metrics on this. The outcome will be a lack of visibility and engagement. As a minimum we would like to see 2 or 3 named officers per ward with a designated investigatory lead.
- Reduced engagement will be compounded by the flexing of resources across the Borough, and more worrying still, by the lifting of the ringfence from abstraction from Safer Neighbourhood Teams. Inevitably they will be the first port of call for abstraction. Sutton already suffers from a disproportionate call on its resources to support other policing pressures in the capital. These include planned events such as Notting Hill Carnival, public demonstrations etc. but also major incidents and public disorder. Sutton Police were among the first on the scene in July 2007 and were supporting colleagues in Tottenham during disorder in 2011.
- The effect on Sutton of diminished resources (via abstraction and a purely investigatory reactive focus) will be worsened by reduction in experienced senior ranks to manage this. Sutton was commended for its response to public disorder in 2011 because of the proactive action across our partnerships, and because of the leadership and visibility of our Borough Commander. Chief Superintendent Ferguson personally led the Specials and Council funded Safer Parks Team (being the only resources left to him), in two baton charges to successfully protect our prime retail area. We are very concerned that senior supervisory ranks in Sutton will be reduced. We doubt whether an officer of more junior rank and experience could rise to the challenges we face and suspect that if the proposals you are mapping out had been in place in 2011 Sutton would have shared a similar fate to our neighbours in Croydon.

- Final resource allocation should be published clear and transparent both by ward and by Borough in order to enable future scrutiny investigations.
- A critical omission in the Plan is its silence in regard to safeguarding of both children and adults. This is a short sentence to make a serious point. It is still longer than any references to safeguarding within your plan.

Thank you for taking the time to personally come to Sutton. I look forward to seeing a revised plan and response to the comments you have received. My officers would be more than happy to discuss any points of detail and contact details are given in the appendix.

Yours sincerely

Cllr Ruth Dombey
Leader of the Council

Cc: Joanne McCartney AM
Chair of the Police and Crime Committee

Police and Crime Plan: detailed response

Any enquiries regarding this response should be directed to:

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1 Issues

1.1 The plan proposes a new resourcing and engagement model as well as aspirations for various outcomes. The likely impact in Sutton is explored below.

2 Resourcing

2.1 The new Local Policing Model will be centred on Safer Neighbourhoods policing. Each neighbourhood team will have a broader remit to cut crime, support victims and tackle offending. They will be supported by teams of officers who will both provide patrolling support and responsive back up. In Sutton this will mean that each local Committee area will have an Inspector leading teams across the wards with a PC and PCSO dedicated to each ward and a Sergeant named for each ward. Other police constables, police community support officers, special constables and volunteers will work across the Local Police Area according to need. More investigation will take place at this local level. Safer Schools officers will be retained for every secondary school that wants one. It is unclear whether these are inclusive or additional to the Borough figures cited. Similarly we understand, though it is not explicit, that Safer Transport Officers are not included in these numbers. Community Safety Units, dealing with issues such as hate crime and domestic violence will remain. Sutton, like other Boroughs, will maintain its own borough commander but it is not clear at what rank.

2.2 It appears Sutton will get an increase of 42 officers by 2015. However this is potentially misleading as it doesn't take account of reduction in PCSOs and civilian staff and the small amount of numbers "over-strength" that Sutton has had for the past few years. In actuality Police resource in Sutton under the proposals will remain broadly similar to the current resource in terms of FTE (full-time equivalent) posts. In substance it will be made up of more PCs but less Inspectors, Sergeants, PCSOs and civilian staff. Publication of such "headline" increases runs the risk of seriously raising public service expectations. Considering the extra responsibilities on PCs and the lifting of ring fencing against abstractions from local duties, there is little or no real gain in terms of hours on the streets (visibility) and potentially a loss. Reduction of civil staff numbers in local police stations means there is a fear that either

capacity for work will be reduced, sworn police officers will be redeployed to do existing work (making them unavailable for operational duties), or both. Sutton has historically and routinely suffered from abstractions. We seek assurances that such abstractions are more evenly felt across London. The lifting of a ringfence on abstraction of SNTs is likely to worsen not improve the current situation for Sutton.

2.3 We have concerns over the level of senior staff that will be left in Borough. The plan is silent on the seniority of Borough Commanders and their management team. We would not wish to see this diminish and would be concerned that a lower ranking officer would not carry sufficient weight to raise our Borough concerns within the MPS structure. We are also concerned as the Council, as part of its contribution to the Safer Sutton Partnership, part funds a member of the local Senior Leadership Team. We seek confirmation that this post is outside of the current proposals and that any potential change to that post would only be made through specific local consultation. We also understand that some of the proposals include borough officers managing supra-borough services e.g. CID across two boroughs. This will dilute local accountability. It is regrettable that the Councils' statutory scrutiny function has been overlooked as part of the consultation process.

2.4 Our opposition to the proposed closure of Crosspoint House, Wallington has been stated previously and remains. We would like to see exploration of the use of volunteers to keep this front counter open.

2.5 The specific crime prevention fund mentioned approximates to £30,000 per Borough. We would welcome confirmation of process for allocation including whether there is a ringfenced amount for each Borough.

3 Engagement

3.1 A Safer Neighbourhood Board will be established in every borough by 2014 giving local Londoners and victims a greater voice. These Boards, supported by MOPAC, will establish local policing and crime priorities and fulfil a range of important functions, including monitoring public complaints against the police and community confidence in their area, and ensuring all wards have a ward panel in place. We seek assurance that the Council will be fully involved in the establishment of such a board and locally elected councillors will be represented on it. We will need to positively influence the relationship between this Board and the statutory Community Safety Partnership for the Borough and its role in establishing local policing and crime priorities.

3.2 MOPAC aims to improve connections with local communities to ensure community tensions are identified and acted on. This will be done through Safer Neighbourhood Boards. We expect that local councillors as elected community representatives will be integral to Safer Neighbourhood Boards and look forward to advising on their composition locally.

3.3 MOPAC will assess how the MPS is improving its ability to monitor and analyse social media and the internet. Sutton would like to share its positive experience

to date in this area including current innovation that has attracted EU funding for development.

3.4 The plan sets targets to improve confidence in policing by 20%. Sutton has one of the best confidence results in London using the MPS analysis. This is more impressive when considered alongside our long and sustained track record in reducing the fear of crime of residents. This is due to our excellent local needs analysis, informed by detailed community engagement and an approach of tackling key signals that drive fear of crime. We would like to share our best practice in this area.

3.5 A key element of the reducing estate strategy is providing a number of contact points (in shops, libraries, and other locations) in every borough. People can meet with Safer Neighbourhood Teams, report lost property, crime and anti-social behaviour as well as hand in property. There will be pilots in place by June 2013. The separately published Estates Strategy proposes the closure of the front counter at Crosspoint House, Wallington, contrary to this aim. We oppose this closure. We are nonetheless also interested in discussions locally about other ways of improving public access. The Safer Sutton Partnership has already invested in a Mobile Reassurance Unit.

3.6 MOPAC will work to support individuals and communities to play an active role in maintaining their own safety, through a range of measures:

- With the London Neighbourhood Watch Association and local communities, develop Watch Schemes across London. Business based Watch-style schemes, such as Pub Watch and Shop Watch may be an active part of this as may reporting tools like FaceWatch

- Schemes such as “City Safe”, which provides safe havens across London for young people who feel they are in danger will be reviewed and promoted

- As economic crime is vital, MOPAC will work with the City of London Police, the MPS and business representatives to strengthen London’s approach to tackling business and economic crime

3.7 Sutton is a Borough where policing is by consent. We have a very active and far reaching Neighbourhood Watch, PubWatch and Business Crime Reduction Partnership which we would be happy to showcase.

4 Outcomes

4.1 Commitments to reduce neighbourhood crime by 20% are laudable but it is unclear how the plan will deliver this.

4.2 MOPAC will take steps to encourage people to report crime, particularly under-reported crime such as domestic and sexual violence and hate crime are under-reported. This is laudable but it is not clear how this will be achieved. MOPAC also commit to providing more and better ways for the public to report

crime. This is laudable but it is not clear how this will be achieved. In particular we would welcome detail on MOPAC's plans to support third party reporting.

4.3 The plan states there will be more opportunities for victims to report crime through third parties such as the Havens (specialist NHS centres for people who have been raped or sexually assaulted). This is laudable but it is not clear how this will be achieved.

4.4 Robust programmes will be put in place aimed at reducing repeat victimisation in key areas such as anti-social behaviour, hate crime and domestic violence. This is laudable but it is not clear how this will be achieved.

4.5 MOPAC will work with the MPS to identify best practice and develop strategies to reduce repeat victimisation with partner agencies such as housing providers, social services and education. This is laudable but it is not clear how this will be achieved, nonetheless we welcome the intention of further partnership working.

4.6 MOPAC's intent to publicise good practice to identify bad practice re Stop and Search is laudable. It could go further and actively seek to disseminate good practice in this area e.g. in Sutton young advisers participate in Police briefings on Stop and Search and accompany officers on operations acting as a third party if a member of the public how has been stopped wishes to discuss any concerns over the process.

4.7 MOPAC analysis will be shared with community safety and criminal justice partners so local multi-agency responses to local problems can be developed. Sutton is a model of excellence in data sharing for community safety. We would be interested in helping MOPAC develop its capacity.

4.8 MOPAC is committed to using technology to design out crime. Sutton has a strong track record of innovation in this field pioneering CCTV, ANPPR and other developments. We would be interested in helping MOPAC develop capacity. In particular our model of CCTV has yielded efficiency for both Council and MPS as well as better outcomes for residents. MOPAC will be mindful of the need to procure well designed/appropriate IT systems.

4.9 MOPAC recognises that there are already many effective partnerships in place across London, focusing on things that matter to local communities but asserts there are some key areas – drugs, gangs, violence against women and girls, and alcohol - in which greater success could be delivered through the development of London wide strategies that identify our shared approach to prevention, enforcement and diversion. The Mayor intends to take oversight of partnership working in these areas through robust performance monitoring and holding all of the agencies to account. A London-wide focus can be helpful but this must not be at the expense of local priorities, distort local delivery or drive up the fear of crime where it is not merited.

4.10 MOPAC will develop an alcohol related crime strategy for London focussed on prevention, enforcement and diversion. These will draw on best practice from around the world such as a compulsory sobriety scheme like that used in parts

of the United States and will consider the use of controlled drinking zones. A strategic licensing function will gather data from all relevant agencies including the police, London Ambulance Service and A & E departments. This will enable better identification of problem premises and hotspots and will assist local authorities, the police and other partners to close them down. We offer Sutton as a showcase of how to address alcohol through a multi-agency approach. We note though that this multi-agency approach is reliant on resource from key public agencies including Council, Health and Police. In Sutton MPS currently resource two police officers and one member of the civil staff who are key to our success.

4.11 MOPAC will also develop a drugs strategy for London, aligned to the Government's strategy, to reduce demand, restrict supply and build recovery. This will put more responsibility on offenders to overcome dependency, learning from the HOPE programme in the USA, which require offenders to report daily and participate in random drug tests. We offer Sutton, and our nationally excellent outcomes as a showcase of how to successfully tackle drug issues through a multi-agency approach.

4.12 MOPAC through the LCRB Anti Gangs Strategy will provide strategic leadership and improve co-ordination of current arrangements across regional agencies and will also provide additional support for local partnerships in managing risk associated with gangs and gang members. The strategy will also guide MOPAC's commissioning from 2013, supporting an evidence-based approach to commissioning and delivery of effective programmes and interventions to reduce participation in gangs and gang related violence and offending. This is an important issue that MOPAC should prioritise but should not be presented as a London-wide issue. Confronting gangs is an important area of focus in some parts of London but is not typical of the Sutton experience or many other areas. While these issues should be addressed we would not want loss of focus on the issues that are important to our residents or unnecessary increase in fear of crime by extrapolating the problems of a minority of Boroughs across London.

4.13 The Mayor will publish the second violence against women and girls strategy in summer 2013 focussed on prevention and intervention, dealing effectively with perpetrators to stop violence and supporting victims and their children to rebuild their lives and reduce their risk of experiencing further violence. Partners on the London Crime Reduction Board will commission and fund a pan-London domestic violence service. We welcome this and look forward to the detail of how this will be achieved and in particular how it will serve the residents of Sutton (much pan-London commissioning is actually received by only a handful of Boroughs). A commitment re rape crisis centres is made but is unclear due to printing error.

4.14 The Plan notes that anti-social behaviour is consistently raised as one of the greatest concerns by Londoners and is reflected as a priority in local community safety strategies across London. The London Crime Reduction Board has identified anti-social behaviour as a priority for its 2012-13 work programme and partners at the LCRB will set strategies and principles of best

practice that aim to address the challenge. We offer Sutton as a showcase of how to successfully tackle ASB through a multi-agency approach. Sutton has seen falling ASB and falling concern over ASB because of its innovation in this area.

4.15 The Plan notes concern over dangerous dogs and proposes enforcement effort will be targeted on the irresponsible dog breeders and owners that form a minority of the overall dog owning population. We offer Sutton as a showcase of how to address irresponsible dog owners. Our approach is now recognised as national best practice and has been commended by the RSPCA and the Kennel Club as well as being adopted by other Police authorities.

4.16 The Mayor intends to performance manage the efficiency and effectiveness of London's criminal justice system and has set a target of reducing reoffending by young people leaving custody in London by 20%. This requires close working pre-release with local YOTs. We would be interested to know how MOPAC will support local YOTs to achieve this aim and how it will interface with the Youth Justice Board.

4.17 The plan recognises that the likelihood of reoffending is reduced by working with offenders to deal with problems such as housing, substance misuse and training and employment. MOPAC aspires to ensure there is better and more universal resettlement and a better grip on persistent and prolific offenders. This is laudable but it is unclear how this will be achieved.

4.18 In London 77% of community orders or licences are successfully completed (against a target of 71%). But other areas nationally are performing much better – as high as 87%. MOPAC aspires to drive performance improvement, through the use of innovations such as tough new community sentences. We would be interested in proposals on this and seek to input to them as community sentences will ultimately be served in our community.

4.19 The plan makes note of LCRB "justice reinvestment" pilots but offers no evaluation or roll out at this point. Instead it points to Social Impact Bonds (SIBs) where investors pay for the project at the start, and then receive a payment based on the outcomes achieved by the project. It states further that the MOPAC commissioning framework will be used to support programmes delivered through 'Payment by Results'. It is unclear whether MOPAC is investing in Social Impact Bonds or planning to offer rewards for those that achieve them.

4.20 MOPAC is looking to take strategic leadership of Integrated Offender management across London and recognises this as one of the most important strategic aspirations in the plan. The Mayor proposes to establish a Director of Offender Management to work with partners to improve the multi-agency approach to supporting offenders. It is unclear how this sits with recent Government announcements to offer supervision for all but the most high risk offenders through the third sector rather than Probation. MOPAC asserts it is best placed to provide strategic oversight over the youth justice and custody budgets in a way that will encourage youth offending teams (YOTs) to focus

meaningfully on alternatives to custody. We are already working collaboratively with the boroughs and all of the relevant criminal justice agencies. We have no evidence of MOPAC's collaborative working regarding Sutton's YOT.

4.21 MOPAC will aspire to gain more responsibility for crime reduction in the capital and to control more of the funding provided for public safety in London. In particular, the Mayor wants to focus on:

- Working with local authorities to ensure housing, benefits and education needs are met
- Work with the National Offender Management Service to jointly commission services for offenders – in particular offender health services
- Work with employers and Job Centre Plus to identify employment opportunities for ex-offenders
- Ensure commissioning is evidence based, with a focus on payment by results
- Understand and improve the money flow – reducing duplication and driving efficiencies
- Promoting opportunity for cross borough collaboration

4.22 We offer the Safer Sutton Partnership as a showcase of excellence in community safety.

4.23 The Mayor has committed to providing a further £3.5m to improve resettlement support for young offenders leaving custody from 2012-2015.

4.24 Reducing the numbers of crimes fuelled by drugs and/or alcohol is a high priority and MOPAC will look to impose enforced sobriety on substance-misusing offenders, combined with an intensive testing regime and a swift and sure punishment for those who fail to remain abstinent. It is unclear how MOPAC will achieve such sentencing, and what the punishment for failure to comply would be.

4.25 The Mayor has successfully lobbied for legislation to allow for the introduction of a new sentencing power, the Alcohol Abstinence Monitoring Requirement (AAMR), to tackle the significant problem of alcohol related violence. MOPAC has led negotiations with central and local government, Her Majesty's Courts and Tribunals Service, the Crown Prosecution Service, London Probation Trust and the boroughs of Sutton and Croydon to develop and roll out the pilot for the Alcohol Abstinence Monitoring Requirement (AAMR).

4.26 The pilot will commence in the new financial year. The pilot will test how widely magistrates use AAMR; the technical processes within the criminal justice system; the effectiveness of electronic monitoring and breath tests; compliance with and breaches of the order; offending behaviour and cost. Once MOPAC have learned the lessons, all of the criminal justice agencies will work together to roll out this approach across London. Sutton is a participant in this pilot. The significant role of the Council as commissioner of substance misuse treatment risks being overlooked in this project.

4.27 London will pilot a version of the HOPE probation programme used in Hawaii. This approach sees drug-misusing offenders clearly warned that if they violate the rules of the scheme, they go to prison. They must subscribe to an intensive drug-testing regime to ensure they remain abstinent, whilst other treatment is provided to help them remain drug-free. This could potentially use the SIB vehicle described earlier. MOPAC will work in partnership with the new Local Health and Wellbeing Boards across London to ensure that boroughs continue to tackle crime resulting from substance misuse, whether illicit drugs or alcohol. The links made between substance misuse, community safety and public health are welcome.

4.28 The Mayor is keen to try out new types of sanctions to tackle longstanding crime problems that have not been dealt with through methods currently on the statute book. Further detail is needed on this proposal.

4.29 The Mayor will ensure that more offenders serving community sentences are visibly doing tougher and more intensive tasks that communities themselves have identified, to improve their neighbourhoods. MOPAC will work with London Probation Trust and Serco to strengthen the involvement of local people in Community Payback to ensure it commands their confidence by making justice more visible. The Mayor will also work with London Probation to improve completion rates of community sentences in line with the targets outlined above. MOPAC will use its Safer Neighbourhood Boards (SNBs) to ensure that local people and, in particular, victims are able to set the tasks that offenders from their neighbourhood should undertake as payback for their crimes. One of the new duties of SNBs will be to monitor complaints from victims of crime and to monitor crime performance and community confidence in their area. This will enable SNBs to play a significant role in Community Payback. Sutton has a well established Community Payback scheme. It has established relationships with Serco as the new provider. It is unclear how MOPAC will add value to the existing process locally. We would expect to link current successful processes to the proposed oversight from the proposed new Safer Neighbourhood Board.

Questions suggested by MOPAC and response

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

Safeguarding is a critical area of omission from the Plan. The Mayor should set out his objectives and goals in this fundamental area.

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

Working locally through multi-agency approaches delivering co-produced solutions is key to success. Local authorities and community safety partnerships are at the heart of this and Mayoral engagement and empowerment of these agencies will be critical to achievement of his objectives.

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

Sutton's multi-agency co-production has delivered cashable efficiencies, reduced crime and increased reassurance. The Mayor should seek to replicate, transfer and upscale this best practice to achieve his 20/20/20 vision. Fundamental to this is the work we have led on addressing signal crimes.

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?

Such an either or question is too simplistic. Sutton has a strong track record of achieving efficiency and cashable savings details of which will be enclosed with our response.

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

The Local Policing Model proposals risk disinvestment in crime prevention e.g. crime prevention design and licensing officers. Sharing and adoption of good practice driven by strong engagement and policing by consent is key to success as well as embracing new technology.

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

Better engagement with offenders is needed. One hour supervision per week is ineffective yet further hours are unaffordable. A better understanding of how non-statutory providers can assist is essential.

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

The Plan is broad in scope and without further detail it is difficult to unpick this further. The primacy given to drugs and alcohol in particular is welcome.

Safeguarding children and adults is a critical area of omission. The interface with the Youth Justice Board should be set out.

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

We are concerned that there is insufficient weight given to working with local authorities and community safety partnerships. There seems a clear drive to working direct with third sector organisations. Sutton's experience of pan-London commissioning of this type is varied but more often than not providing poor value for money and assertions only of delivery to our residents which fail to be backed by outcomes. Pan-London commissioning takes Sutton residents' money and spends it badly on projects elsewhere that deliver dubious outcomes.
Safeguarding is a critical area of omission. The interface with the Youth Justice Board should be set out.