MOPAC MAYOR OF LONDON OFFICE FOR POLICING AND CRIME

DMPC Decision – PCD 785

Title: **MPS County Lines Operations Centre**

Executive Summary:

The Metropolitan Police Service (MPS) has been allocated £5.6m grant funding to set up and run an MPS County Lines Unit in 2020/21.

MAYOR OF LONDON

County Lines is a drug supply business model, predominately of Class A, and is an industry believed to be worth in excess of £800m UK wide. The funding will assist the MPS to achieve high impact results to combat groups running county lines.

This paper seeks approval to accept the Home Office funding and the paper outlines how the money will be used over the timeframe from 1 April 2020 to 31 March 2021.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

- 1. To approve the acceptance of the £5.6m Home Office funding. The grant funding is for expenditure during the period 1 April 2020 to 31 March 2021. The grant is managed through quarterly returns via corporate finance partners. Funding is received end of year.
- 2. Note the expansion of Operation Orochi into the MPS County Line Operations Centre (MCLOC) to undertake a range of activities to combat County Lines drugs supply and its associated threat, risks and harm.
- 3.

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	27/7/20	
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PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

1. Introduction and background

- 1.1. County Lines is a drug supply business model, predominately of Class A, and is an industry believed to be worth in excess of £800m UK wide. This in turn stimulates the activity within the middle market drugs supply linked to organised crime.
- 1.2. The scale of the current complex threat posed by county lines in relation to the exploitation of children and other vulnerable persons to facilitate drug dealing is extensive and affects every police force area.
- 1.3. The NCA and National County Lines Co-Ordination Centre 2019 assessments provide evidence that London is the biggest exporter of county lines. This equates to 30% of the 800-1000 active county lines drug networks across the UK.

2. Issues for consideration

- 2.1. The core aims of Op Orochi are:
 - To create operational partnerships with Home County Forces (HCFs) to target County Line-Line Holders that control the Line, with an objective to charge and remand for drug supply offences, seize weapons, cash, and confiscate other realised asset. Evidence shows that these offenders are often violent offenders resident in London.
 - Safeguarding intelligence actioned immediately with the commencement of modern slavery offences where applicable. This will involve joint working between MPS and the County Force. Op Orochi will also use the investigative methodology already shown to be successful targeting line-holders, by utilizing intelligence from exploited children. This will provide opportunities for Modern Slavery charges and also identify further active lines that the OCN may be using to exploit further children.
 - Conduct overt operations to disrupt County Lines activity in partnership with forces/partners, focusing on transport routes and wanted offenders.
- 2.2. Funding will be used to build internal intelligence flows from within MPS and into Op Orochi. This will be a referral process but will allow for BCU staff to be mentored whilst retaining primacy. This structure will allow for best practice to be shared and allow hardware and software used specifically for this work, provided with previous funding, to be maximized.
- 2.3. This funding is to enable the creation of a new unit to build on the lessons learnt from Operation Orochi (the pilot presented in DMPC decision paper PCD726). Op Orochi was focused on reducing the harm caused by County Lines, both in the MPS and the HCFs;
 - by arresting, charging and convicting for serious offences, those violent offenders controlling the CLs and the London gangs behind them;
 - by disrupting the flow of Class A drugs to the HCF and reducing the consequential harm that follows.
 - by safeguarding the vulnerable including those children criminally and sexually exploited.

- 2.4. Op Orochi has enabled the MPS to deliver operational results for those criminal networks who operate from London into importing forces. The funds will assist with the MPS in achieving further high volume, high impact results to combat these groups running county lines.
- 2.5. Op Orochi is an Operational Command Unit with 100% capability to investigate, proactively and reactively. This unit will deliver direct impact to the issue of County Lines by targeting those that control, organize and facilitate this illegal activity, thus rendering the deal line 'closed'. The NCLCC co-ordinate activity and gather intelligence from Forces / ROCUs, therefore don't have any operational capability and has led to the requirement for an MPS unit.
- 2.6. The staffing of Op Orochi expansion, 59 MPS officers and 4 police staff, will come from across MPS business groups and the funding awarded is required to pay staffing costs along with equipment, vehicles and overtime. The staff will be seconded from existing posts and redeployed at the end of the funding period. The vacancies from the Secondments are already being managed through ongoing PC uplifts into the MPS.

3. Financial Comments

- 3.1. The full cost to establish the unit including the cost of the 59 police officers and 4 police staff and associated running costs will be fully funded by the £5.6m Home Office grant.
- 3.2. Detailed information is contained in the restricted section of the report.

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 all bids for grant funding made and all offers made of grant funding.

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. A DPIA will be completed for this project prior to it becoming operational. The project will ensure a privacy by design approach, which will allow the MPS to find and fix problems at the early stages of any project, ensuring compliance with GDPR. DPIAs support the accountability principle, as they will ensure the MPS complies with the requirements of

GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.

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 under Sec 149 of the Equality Act 2010. Consideration has been taken to assess equality impact caused by the proposed business change including effective engagement and analysing relevant equality information. As a result, no negative impact has been identified to any individual at this stage; however, a full EIA will be completed prior to any operational activity being undertaken by the expanded unit. It is important to note that Op Orochi uses a methodology that identifies the criminal enterprise (the county line) at the outset and this is the starting point of the investigation. This investigation then leads to those responsible for the illegal enterprise and only those responsible for holding / controlling the line are subject of police action.

7. Background/supporting papers

7.1. The MPS Report.

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.	\checkmark	
Legal Advice		
The MPS legal team has been consulted on the proposal.	\checkmark	
Equalities Advice:		
Equality and diversity issues are covered in the body of the report.	\checkmark	
Commercial Issues		
The Contract Management Team has been consulted on the commercial issues within this report.	\checkmark	
GDPR/Data Privacy		
• GDPR compliance issues are covered in the body of the report	\checkmark	
Director/Head of Service		
The CFO has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.	\checkmark	

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

Ganahuchterd.

Date 15/07/2020



MOPAC MAYOR OF LONDON OFFICE FOR POLICING AND CRIME

MPS County Lines Operations Centre

MOPAC Investment Advisory & Monitoring meeting 21st May 2020

Report by T/DCS Mike West 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

The purpose of this document is to seek approval to draw down funding of £5.6m from a bid approved by the Home Office to set up and run a dedicated MPS County Lines Unit – Operation Orochi, for 2020/21.

The core aims of Op Orochi are:

- To create operational partnerships with Home County Forces (HCFs) to target County Line-Line Holders that control the Line, with an objective to charge and remand for drug supply offences, seize weapons, cash, and confiscate other realised asset. Evidence shows that these offenders are often violent offenders resident in London.
- Safeguarding intelligence actioned immediately with the commencement of modern slavery offences where applicable. This will involve joint working between MPS and the County Force. Op Orochi will also use the investigative methodology already shown to be successful targeting line-holders, by utilizing intelligence from exploited children. This will provide opportunities for Modern Slavery charges and also identify further active lines that the OCN may be using to exploit further children.
- Conduct overt operations to disrupt County Lines activity in partnership with forces/partners, focusing on transport routes and wanted offenders.

Recommendations

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

- The acceptance of the £5.6m Home Office funding that is for 1st April 2020 to 31st March 2021. The grant is managed through quarterly returns via corporate finance partners. Funding is received end of year.
- 2. Funding will be used to build internal intelligence flows from within MPS and into Op Orochi. This will be a referral process but will allow for BCU staff to be mentored whilst retaining primacy. This structure will allow for best practice to be shared and allow hardware and software used specifically for this work, provided with previous funding, to be maximized.

And note

3. The expansion of Operation Orochi is to undertake a range of activities to combat County Lines drugs supply and its associated threat, risks and harm.

Time sensitivity

A decision is required from the Deputy Mayor by 29th May 2020. This is because the operational delivery for FY 20/21 needs to start in June/July 2020 to ensure desired outcomes are reached.

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

Introduction and background

- 1. County Lines is a drug supply business model, predominately of Class A, and is an industry believed to be worth in excess of £800m UK wide. This in turn stimulates the activity within the middle market drugs supply linked to organised crime.
- 2. The scale of the current complex threat posed by county lines in relation to the exploitation of children and other vulnerable persons to facilitate drug dealing is extensive and affects every police force area.
- 3. The NCA and National County Lines Co-Ordination Centre 2019 assessments provide evidence that London is the biggest exporter of county lines. This equates to 30% of the 800-1000 active county lines drug networks across the UK.

Issues for consideration

- This funding is to enable the creation of a new unit under to build on the lessons learnt from Operation Orochi (the pilot Q3 and Q4 of FY 19/20). Op Orochi was focused on reducing the harm caused by County Lines, both in the MPS and the HCFs;
 - by arresting, charging and convicting for serious offences, those violent offenders controlling the CLs and the London gangs behind them;
 - by disrupting the flow of Class A drugs to the HCF and reducing the consequential harm that follows.
 - by safeguarding the vulnerable including those children criminally and sexually exploited.
- Op Orochi has enabled the MPS to deliver operational results for those criminal networks who operate from London into importing forces. The funds will assist with the MPS in achieving further high volume, high impact results to combat these groups running county lines.
- Op Orochi is an Operational Command Unit with 100% capability to investigate, proactively and reactively. This unit will deliver direct impact to the issue of County Lines by targeting those that control, organize and facilitate this illegal activity, thus rendering the deal line 'closed'. The NCLCC coordinate activity and gather intelligence from Forces / ROCUs, therefore don't have any operational capability and has led to the requirement for an MPS unit.
- The staffing of Op Orochi expansion, 59 MPS officers and 4 police staff, will come from across MPS business groups and the funding awarded is required to pay staffing costs along with equipment, vehicles and overtime. The staff will be seconded from existing posts and redeployed at the end of the funding period. The vacancies from the Secondments are already being managed through ongoing PC uplifts into the MPS.

Contributes to the MOPAC Police & Crime Plan 2017-2021¹

The work this unit will undertake directly impacts upon serious violent crime and the criminality of urban street gangs/Organised Crime Groups. It will also seek to reduce the exploitation of young people, criminal and sexual, seen through the running of county lines.

¹ Police and crime plan: a safer city for all Londoners | London City Hall

Op Orochi will build a referral process to pilot intelligence from the MOPAC commissioned Rescue & Response pan London county lines service, with a view to enhancing safeguarding opportunities. This will also be piloted within MPS using other sources of intelligence from a range of units. Op Orochi will also use the investigative methodology already shown to be successful targeting line-holders, by utilising intelligence from exploited children. This will provide opportunities for Modern Slavery charges and also identify further active lines that the OCN may be using to exploit further children.

Financial, Commercial and Procurement Comments

The unit will be fully funded by the home office grant of £5.6m to include staff and associated running costs. Detailed information is contained in the restricted section of the report.

Legal Comments

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 all bids for grant funding made and all offers made of grant funding.

Equality Comments

This business case has undergone initial equality screening. Due regard has been taken to the Equality Act's Public Sector Equality Duty under Sec 149 of the Equality Act 2010. Consideration has been taken to assess equality impact caused by the proposed business change including effective engagement and analysing relevant equality information. As a result, no negative impact has been identified to any individual at this stage; however, a full EIA will be completed prior to any operational activity being undertaken by the expanded unit. It is important to note that Op Orochi uses a methodology that identifies the criminal enterprise (the county line) at the outset and this is the starting point of the investigation. This investigation then leads to those responsible for the illegal enterprise and only those responsible for holding / controlling the line are subject of police action.

Privacy Comments

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.

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.

A DPIA will be completed for this project prior to it becoming operational. The project will ensure a privacy by design approach, which will allow the MPS to find and fix problems at the early stages of any project, ensuring compliance with GDPR. DPIAs support the accountability principle, as they will ensure the MPS

complies with the requirements of GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.

Real Estate Implications

This information is contained in the restricted section of the report

Environmental Implications

There are no identifiable benefits to the London Environment Strategy

Background/supporting papers

This information is contained in the restricted section of the report

Report author: Mike West, Temp Det Ch Supt

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 [OPERATIONAL]

Part 2 of the MPS County Lines Operation Centre Outline Business Case is exempt from publication for the following reasons:

- Article 2(2)(c) of the Elected Local Policing Bodies (Specified Information) Order 2011; and
- Section 31(1) (Law Enforcement) of the Freedom of Information Act 2000

The paper will be retained for a minimum of 6 years according to the MPS Records Management Policy.