

DMPC Decision – PCD 1012

Title: Continuation of Sponsorship by Marks and Spencer of the Action Counters Terrorism (ACT) E Learning Product

Executive Summary:

This decision seeks the approval to accept sponsorship funding of an additional £30,000 bringing the total sponsorship from Marks and Spencer for the Action Counters Terrorism (ACT) E-Learning to £109,000.

Recommendation:

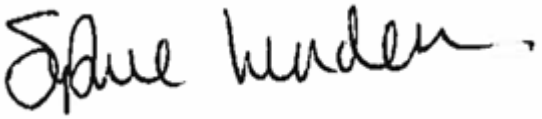
The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the acceptance of continued sponsorship, to the revised value of £109,000, for the ACT e-learning package, from Marks and Spencer, pursuant to section 93 of the Police Act 1996

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 28/7/2021

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

1. Introduction and background

- 1.1. The Action Counters Terrorism (ACT) E Learning programme is an online version of the ACT Awareness presentation, delivered by Counter Terrorism Security Advisors (CTSAs), which was formally known as Project Griffin.
- 1.2. Marks and Spencer have previously sponsored the ACT E-learning package to the value of £79,000 – see PCD567. They would like to continue to provide sponsorship for this product. This additional sponsorship has been valued at £30,000 for 2021-2022, which takes the total sponsorship to £109,000.

2. Issues for consideration

- 2.1. ACT products are the recommended engagement tool for delivering Counter Terror (CT) awareness advice and training to industry partners for all police forces in England and Wales and Scotland. They are used to support engagement across a diverse range of industry sectors, particularly those within crowded places. The stated mission of the ACT E-learning product is to 'engage, encourage and enable members of the community to work in partnership with the police to deter, detect, and counter terrorist activity and crime,'.
- 2.2. The package provides free accredited counter terrorism advice for anyone wishing to access it. The package is now available for individuals as well as business. Being an online package it was a vital tool during the last year which allowed Counter Terror Policing (CTP) to continue to reach audiences with counter terrorism advice remotely. Updates have been made to improve the accessibility of the package, which is now fully subtitled.
- 2.3. Nearly one million modules have been completed by learners in the last 12 months. The continued availability of this package may result in the disruption of terrorist activity by improving situational awareness of the public, early reporting and prompt action, which could save lives and mitigate the impact of a terrorist incident. The ACT e-learning continues to develop to improve the user experience. Developments scheduled for this year include, updates to guidance and a full British sign language version.

3. Financial Comments

- 3.1. The proposal is to accept benefit in kind sponsorship valued at £30,000, bringing the total sponsorship by Marks and Spencer to £109,000. If the funding ceases the budget to support the ACT Elearning will come from existing Counter Terror Policing budgets.

4. Legal Comments

- 4.1. Section 93 of the Police ACT 1996, allows the MOPAC, as the local policing body, in connection with the discharge of any of its functions, to accept gifts and loans of

money and resources and includes the ability to provide commercial sponsorship terms to the third party.

- 4.2. The MOPAC scheme of Delegation at Clause 4.8 requires the Deputy Mayor for Policing and Crime to approve all inward donations and sponsorship £50,000 and above in value.

5. GDPR and Data Privacy

- 5.1. MOPAC will adhere to the Data Protection Act (DPA) 2018 and ensure that any organisations who are commissioned to do work with or on behalf of MOPAC are fully compliant with the policy and understand their GDPR responsibilities.
- 5.2. The MPS assure that DPIA screening has been completed for this project. There are no privacy issues relating to this proposal. The ACT e-learning package does not store any personal information, and all analytical data is collated anonymously. 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. MOPAC is required to comply with the public sector equality duty set out in section 149(1) of the Equality Act 2010. This requires MOPAC to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations by reference to people with protected characteristics. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.2. The MPS assure that there are no identified or anticipated negative equality impacts relating to this proposal from an internal perspective. From an external perspective, the ACT e-learning package has been assessed for accessibility and disability compliance. Full subtitles were added last year and a Welsh version is currently in development. The proposed contribution would assist with development work planned for this year to provide a full British sign language version of the package.

7. Background/supporting papers

- Appendix 1 – MPS paper Continuation of Sponsorship by Marks and Spencer of the Action Counters Terrorism (ACT) E Learning Product

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 –NO

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 has been consulted on the proposal.

✓

Equalities Advice:

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

✓

Commercial Issues

Commercial issues are not applicable.

✓

GDPR/Data Privacy

GDPR compliance issues are covered in the body of the report. A DPIA has been completed

✓

Director/Head of Service:

The MOPAC Chief Finance Officer and Director of Corporate Services 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 27/7/2021



MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

Continuation of Sponsorship by Marks and Spencer of the Action Counters Terrorism (ACT) E Learning Product

MOPAC Investment Advisory & Monitoring meeting - 9th July 2021

Report by Sgt Alex Ward 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

Approval is sought for the continuation of Marks and Spencer sponsorship of the Action Counters Terrorism ACT e-learning package. ACT e-learning is a package free for anyone to access, which provides advice on how people can protect themselves and their business from the threat of terrorism, identify and report suspicious behaviour and advice on how to stay safe during a terrorist incident.

Recommendations

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

1. **Approve the acceptance of continued sponsorship, to the revised value of £109,000, for the ACT e-learning package, from Marks and Spencer, pursuant to section 93 of the Police Act 1996.**

Time sensitivity

A decision is required from the Deputy Mayor by 9th August 2021. This is because the current sponsorship agreement has now lapsed. Marks and Spencer need confirmation of this agreement to be able to renew their contract with the e-learning provider Highfield to ensure there are no gaps in service or system down time.

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

Introduction and background

1. The ACT E Learning programme is an online version of the ACT Awareness presentation, delivered by Counter Terrorism Security Advisors (CTSAs), which was formally known as Project Griffin. Established in April 2004 as a joint venture between business, the City of London Police (CoLP) and the Metropolitan Police (MPS), it has since been adopted as a national programme governed by National Counter Terrorism Policing. Since its inception, Griffin, which was brought under the ACT Awareness banner in 2018, has expanded

significantly and is nowadays viewed as the most effective and successful example of public-private partnership on CT security issues.

2. Its stated mission is to 'engage, encourage and enable members of the community to work in partnership with the police to deter, detect, and counter terrorist activity and crime,' The system has been praised for raising awareness of security and terrorism issues among the business community as well as for facilitating the sharing of valuable information before, during and after an incident.
3. ACT products are the recommended engagement tool for delivering CT awareness advice and training to industry partners for all police forces in England and Wales and Scotland. They are used to support engagement across a diverse range of industry sectors, particularly those within crowded places.
4. In 2017 the change in the nature of the threat to the UK was realised with the devastating effects of several UK terror attacks. The development of ACT Awareness e-learning arose from the response to the attacks of 2017 and responding to business needs. Previously an ACT Awareness package required staff to attend a session in person that was delivered by a qualified CTSA and could last from 2-5hrs. This type of delivery is resource heavy as it requires staff be abstracted for a significant period of time and is reliant on CTSA staff being available to deliver. This format, though highly effective, discouraged some, particularly smaller businesses from engaging with the programme. To increase the reach of CT Awareness training the e-Learning programme was developed, funded entirely by sponsorship with private sector partners Marks and Spencer, to provide an online learning package that the user could guide themselves through, and would take under an hour to complete. This approach hugely reduced the cost implications to businesses of engaging with the programme.
5. The package can be accessed in two ways either via the internet or as a SCORM¹ file which is uploaded onto the company's own training platform. In the last 12 months nearly one million modules of ACT e-learning have been completed. 11,000 organisations are registered and this year the package was made accessible to individuals as well as business and 60,000 individuals have accessed the package. The package also won two awards at the Learning Awards 2021.
6. The ACT e-Learning is the international frontrunner in counter terrorism awareness products. Since December 2018 NaCTSO have been working with the Foreign Office to make the programme available to international partners including Canada and Australia, as there is no equivalent product available internationally. Its international transferability indicates its efficacy and success. The ACT e-learning has very minimal risks associated. The package is free to access by anyone and no personal or identifiable information is held so there are no GDPR issues. Although the content relates to counter terrorism, none of the

¹ SCORM – Sharable Content Object Reference Model. Industry recognised technical standards for digital Learning Management Systems (LMS). A SCORM file allows individual organisations to 'host' elearning on their internal systems for ease of access and maximise learners.

information contained within it is operational sensitive and all is available from other open sources.

7. Marks and Spencer would like to continue to provide sponsorship for this product. This additional sponsorship has been valued at £30,000 for 2021-2022, which takes the total sponsorship to £109,000. MOPAC approval was given previously given to accept sponsorship totaling £79,000 (PCD 567). This additional funding will further exceed the £50k delegated authority threshold detailed in the Scheme of Consent and Delegation requiring Deputy Mayor's approval.

Issues for consideration

8. The package provides free accredited counter terrorism advice for anyone wishing to access it. The package is now available for individuals as well as business. Being an online package it was a vital tool during the last year which allowed CTP to continue to reach audiences with counter terrorism advice remotely. Updates have been made to improve the accessibility of the package, which is now fully subtitled. Nearly one million modules have been completed by learners in the last 12 months. The continued availability of this package may result in the disruption of terrorist activity by improving situational awareness of the public, early reporting and prompt action, which could save lives and mitigate the impact of a terrorist incident.
9. The ACT e-learning package is a counter terrorism product, however, much of the advice provided is applicable in other non-terrorist related situation such as response to disorder or other hazards. The tools provides to help identify suspicious activity may also identify and prevent other types of criminality. The package was developed with business stakeholders and feedback is continually sought and used to update and develop the package.
10. The package is jointly funded by CTP and Marks and Spencer. The sponsorship money is essential for the continued development of the product. The package has been updated to provide a tutorial on the ACT app which is also available for businesses, to streamline access to all protective security guidance documents currently held on the .gov.uk website. The ACT e-learning and ACT app are likely to be crucial resources for business when the Protect Duty legislation is launched (currently in consultation phase). The ACT e-learning continues to develop to improve the user experience. Developments scheduled for this year include, updates to guidance and a full British sign language version.

Contributes to the MOPAC Police & Crime Plan 2017-2021²

11. The online format of the ACT e-learning has allowed it to reach large numbers of people and businesses with counter terrorism advice, which continued throughout the pandemic of 2020-2021. The self-delivery format is cost effective to both the police and business, and the training provides holistic benefits that could contribute to the detection and disruption of all types of crime.

Financial, Commercial and Procurement Comments

² [Police and crime plan: a safer city for all Londoners | London City Hall](#)

12. This proposal seeks approval to accept the further sponsorship offer valued at £30,000 from Marks and Spencer under S.93 of the Police Act 1996. The offer takes the total sponsorship value to £109,000. This is a continuation of services that have been obtained with Commercial Services and in line with agreed policies and legislation. The funding will cover the on-going running costs of the e-learning, IT support and analytics. As an extension to an existing service this work does not change any aspects relating to responsible procurement.
13. The funding is received as benefit in kind and no actual cash is received from Marks and Spencer. If the funding ceases the budget to support the ACT Elearning will come from existing CTP budgets.

Legal Comments

14. S.93 of the Police ACT 1996, allows the MOPAC, as the local policing body, in connection with the discharge of any of its functions, to accept gifts and loans of money and resources and includes the ability to provide commercial sponsorship terms to the third party.
15. The MOPAC scheme of Delegation at Clause 4.8 requires the Deputy Mayor for Policing and Crime to approve all inward donations and sponsorship £50,000 and above in value.
16. The approval will be documented by way of a S.93 sponsorship agreement to formalise the arrangement. The agreement will be published under the Elected Local Policing Bodies (Specified Information) Order 2011.

Equality Comments

17. As this is an extension of an existing service this work does not change any aspects relating to equality or diversity. There are no identified or anticipated negative equality impacts relating to this proposal from an internal perspective.
18. From an external perspective, the ACT e-learning package has been assessed for accessibility and disability compliance. Full subtitles were added last year and a Welsh version is currently in development. The proposed contribution would assist with development work planned for this year to provide a full British sign language version of the package.

Privacy Comments

19. 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.

20. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
21. DPIA screening has been completed for this project. There are no privacy issues relating to this proposal. The ACT e-learning package does not store any personal information, and all analytical data is collated anonymously. The project does not use personally identifiable data of members of the public, so there are no GDPR issues to be considered.

Real Estate Implications

22. There are no real estate implications relating to this proposal as ACT e-learning is a digital package.

Environmental Implications

23. This proposal does not contribute to the Mayor's environmental strategy, beyond reducing travel as participants can complete it from any location.

Background/supporting papers

24. None.

Report author: Sergeant Alex Ward – CT Awareness & Mobilisation Supervisor, NaCTSO, NCTPHQ.

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

There is no information contained in the proposal that is exempt from publication.