

**DMPC Decision – PCD 567**

**Title: Continuation of Sponsorship by Marks and Spencer of the ACT E- Learning Product**

**Executive Summary:**

DMPC approval is sought to continue sponsorship from Marks and Spencer to deliver an online counter terrorism awareness package ACT (Action Counters Terrorism) E Learning, which is free for any company in the UK to access. This continued sponsorship now exceeds the £50k delegated authority threshold and requires Deputy Mayor's approval.

**Recommendation:**

The Deputy Mayor for Policing and Crime is recommended to approve the acceptance of continued sponsorship, to the revised value of £79,000, 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**

*Spence Hinde*

**Date**

*16/9/19*

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

### **1. Introduction and background**

- 1.1. 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. Issues for consideration**

- 2.1. The ACT E Learning programme is a national programme available free of charge to any company wishing to access it as long as they agree to the terms and conditions. It is entirely funded by the sponsorship from Marks and Spencer. There is currently no alternative funding stream. The online format was created specifically in response to business needs to break down previous barriers to engagement with police, and data from the first 9 months demonstrates its success.
- 2.2. The ACT E Learning is a counter terrorism awareness package, however, much of the advice provided is applicable in other situations such as response to public disorder, or other hazards. The tools provided to identify suspicious activity may also identify other types of criminality, furthering holistic engagement between business and police and reducing crime.
- 2.3. The online format of the ACT E Learning has allowed it to reach large numbers in a short space of time, with over 500,000 modules completed since the terror attacks of 2017. The format is cost effective for both the police and businesses, as it is a self-delivery product so there are no staffing costs. The sponsorship of Marks and Spencer means the product also has very limited cost implications for National Counter Terrorism Policing, and has encouraged greater public private partnership working.

### **3. Financial Comments**

- 3.1. 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 £79,000. 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 hosting the E learning, IT support and analytics.
- 3.2. The funding is received as a benefit in kind and no actual cash is received from Marks and Spencer. There is ongoing dependency on this funding.

### **4. Legal Comments**

- 4.1. 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.

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.

4.3. The approval will be documented by way of a S.93 Sponsorship agreement to formalize the arrangement. The agreement will be published under the Elected Local Policing Bodies (Specified Information) Order 2011.

4.4. DLS have approved the legal position above which is based on previous advice to the MET Third Party Contracts Team.

## **5. GDPR and Data Privacy**

5.1. The training package 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. There are no identified or anticipated negative equality impacts relating to this proposal from an internal perspective.

6.2. From an external perspective, the ACT E Learning package has been assessed for accessibility and disability compliance, transcriptions are available for every module for deaf or hard of hearing learners. The proposed contribution would assist in developing the package so subtitles will be provided throughout.

## **7. Background/supporting papers**

7.1. 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:

**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 (✓)
<b>Financial Advice:</b> The Strategic Finance and Resource Management Team has been consulted on this proposal.	✓
<b>Legal Advice:</b> Legal advice included in body of the report	✓
<b>Equalities Advice:</b> Equality and diversity issues are covered in the body of the report.	✓
<b>GDPR/Data Privacy</b> A DPIA is not required.	✓
<b>Director/Head of Service:</b> The Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.	✓

**OFFICER APPROVAL**

**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**

*R. Lawrence*

**Date**

*9/9/19*

**MOPAC**MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME

## Continuation of Sponsorship by Marks and Spencer of the ACT E Learning Product

### MOPAC Investment Advisory and Monitoring Meeting

Report by Supt Adam Thomson on behalf of the Deputy Commissioner

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

#### *EXECUTIVE SUMMARY*

MOPAC approval is sought to continue sponsorship from Marks and Spencer to deliver an online counter terrorism awareness package ACT (Action Counters Terrorism) E Learning, which is free for any company in the UK to access. This continued sponsorship now exceeds the £50k delegated authority threshold detailed in the Scheme of Consent and Delegation and requires Deputy Mayor's approval.

#### **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 £79,000, 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 **01/04/2019**. This is because this is the expiration date of the current sponsorship agreement. Marks and Spencer meet the cost of the ACT E Learning package in full. Without the continued sponsorship of the programme there is currently no alternative funding secured, meaning the programme could not be delivered.

#### **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 intelligence before, during and after an incident.
3. The ACT programme has been expanded and continuously adapted to meet the changing threat picture, particularly in light of the emergence of Daesh (ISIL) and the events of 2017. The content of ACT Awareness products is controlled by the National Counter Terrorism Security Office. 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. ACT Awareness continues to adapt to deliver the critical requirement for counter terrorism policing and business communities to work effectively together to meet the common challenge of terrorism. In doing so it has supported the creation of an enduring, resilient and effective public-private partnership which increases assurance for businesses and citizens alike whilst simultaneously creating a more hostile operating environment for terrorists.
5. The aim of ACT Awareness is to:
  - Help understand the threat from terrorism to the UK
  - Guide individuals on what to do if they find themselves involved in a terrorist incident or events that lead up to a planned attack
  - Enable people to recognise and report suspicious activity
6. 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. The sponsorship although free to the MPS was valued at £49,000 and was accepted under the MPS's delegated authority.

7. This approach hugely reduced the cost implications to businesses of engaging with the programme and in the 9-months the programme has been running the data has been overwhelmingly positive.
8. In the 9 months the ACT E Learning package has been available more people have interacted with it than the total number of people who were delivered Project Griffin in over ten years. Over 1800 companies have signed up, with over 500,000 modules being completed. The package can be accessed in two ways either via the internet or as a SCORM file which is uploaded onto the company's own training platform. Increasingly SCORM file usage is becoming the primary access method, showing how the ACT E Learning is being adopted and fully embedded into companies' policies and procedures around risk management.
9. The online format of ACT E learning allows for the collection of analytics to allow the monitoring of interaction and feedback. Recent results show that 91% of learners would recommend this product to a colleague. 97% of learners either strongly agree/agree that the course achieved its stated objectives.
10. 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.
11. Marks and Spencer would like to continue to provide sponsorship. This additional sponsorship has been valued at £30,000 for 2019-2020, which takes the total sponsorship to £79,000. This exceeds the £50k delegated authority threshold detailed in the Scheme of Consent and Delegation and requires Deputy Mayor's approval.

### **Issues for consideration**

11. The ACT E Learning programme is a national programme available free of charge to any company wishing to access it as long as they agree to the terms and conditions. It is entirely funded by the sponsorship from Marks and Spencer. There is currently no alternative funding stream. The online format was created specifically in response to business needs to break down previous barriers to engagement with police, and data from the first 9 months demonstrates its success.
12. The ACT E Learning is a counter terrorism awareness package, however, much of the advice provided is applicable in other situations such as response to public

disorder, or other hazards. The tools provided to identify suspicious activity may also identify other types of criminality. Furthering holistic engagement between business and police and reducing crime.

13. Promoting counter terrorism awareness enhances individuals' ability to detect and deter hostile behaviour as well as improving their reaction to serious incidents. Providing an online platform to access this programme has made it accessible to much greater numbers of people and businesses than previously. Increasing the number of people with good counter terrorism knowledge and companies with embedded counter terrorism policies and procedures acts towards protecting many public spaces, particularly crowded places that may be desirable targets for attack. The continued availability of this package may result in the disruption of terrorist activity by early reporting by the public, or loss of life or serious injury being mitigated by the actions of those who have completed the programme

#### **Contributes to the MOPAC Police & Crime Plan 2017-2021<sup>1</sup>**

14. The online format of the ACT E Learning has allowed it to reach large numbers in a short space of time, with over 500,000 modules completed since the terror attacks of 2017. The format is cost effective for both the police and businesses, as it is a self-delivery product so there are no staffing costs. The sponsorship of Marks and Spencer means the product also has very limited cost implications for National Counter Terrorism Policing, and has encouraged greater public private partnership working.

#### **Financial, Commercial and Procurement Comments**

15. 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 £79,000. 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 hosting the E learning, IT support and analytics.
16. The funding is received as a benefit in kind and no actual cash is received from Marks and Spencer. There is ongoing dependency on this funding.

#### **Legal Comments**

17. 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.
18. 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.
19. The approval will be documented by way of a S.93 Sponsorship agreement to formalize the arrangement. The agreement will be published under the Elected

---

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



Local Policing Bodies (Specified Information) Order 2011.

20. DLS have approved the legal position above which is based on previous advice to the MET Third Party Contracts Team.

**Equality Comments**

21. There are no identified or anticipated negative equality impacts relating to this proposal from an internal perspective.

22. From an external perspective, the ACT E Learning package has been assessed for accessibility and disability compliance, transcriptions are available for every module for deaf or hard of hearing learners. The proposed contribution would assist in developing the package so subtitles will be provided throughout.

**Privacy Comments**

23. The training package does not use personally identifiable data of members of the public, so there are no GDPR issues to be considered.

**Real Estate Implications**

24. There are no real estate implications relating to this proposal.

**Environmental Implications**

25. This proposal does not contribute to the Mayor's environmental strategy. As an online learning platform the ACT E Learning means participants do not have to travel to undertake the awareness package, and can access it from any location with internet access, be that their normal place of work or home.

**Background/supporting papers**

26. None

**Report author: DS Alex Ward – CT Awareness 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 this proposal that is exempt from publication.

