

DMPC Decision – PCD 590

Title: Ocean Outdoor Counter Terrorism Messaging

Executive Summary:

MOPAC approval is sought to accept a free donation of advertising space from the company Ocean Outdoor to deliver Project Servator counter terrorism messaging to members of the public across London.

The purpose of this is to enhance vigilance, amplify partnership working between MPS and private industry and encourage communities to report suspicious behaviour. Ocean Outdoor have offered to show Project Servator CT messaging during their advertising slots displayed on their public facing screens across the London area.

Although the screens are provided at no cost the overall cost would have been £127k, therefore exceeding the £50k threshold for delegated authority.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to approve:

1. Approval to enter into a sponsorship agreement with Ocean Outdoor on the basis they will provide screenings of Project Servator Counter Terrorism messaging on their outdoor screens at multiple locations with an approximate value of £127k, which will exceed the £50k delegated Authority.

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

Expire Under

Date

27/06/19

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

1. Introduction and background

- 1.1. Project Servator is a Counter Terrorism Project whose role is to look for Hostile Reconnaissance around crowded places, iconic sites, transport hubs and Government Infrastructure. It is an initiative owned by CPNI which is a branch of MI5 designed to target harden areas through visible police deployments, plain clothes tactic and public reassurance encouraging reporting suspicious behaviour. MPS Project Servator Teams also conduct business engagement routine part of their Counter Terrorism deployments.
- 1.2. The MPS needs to work creatively and constructively with partners and the public. With the availability of 'affordable' technology solutions, it is important that the MPS maximises opportunity from this potential. The use of outdoor screens to reinforce and amplify the presence of police in the area shows how police have embraced partnership working with private industry to help protect Londoners and adds credence to Project Servator messaging to reach as many people as possible with a small amount of officers deployed. This supports efficient working whilst ensuring the message is seen by thousands of visitors to the locations.

2. Issues for consideration

- 2.1. The MPS mission is to focus on crime that matters to Londoners and take preventative action. This initiative publicly shows Counter Terrorism Policing teams engaging with the public to deter hostile and criminal activity in the aggregated area. This will help increase public confidence as the MPS will have a strategy to combat terrorism and it will send a clear message to criminals that the MPS is being proactive to deter offences.

3. Financial Comments

- 3.1. The initial roll out at zero cost, with no financial impact on the MPS, not taking into account MPS staff/officer time on the project. The financial sponsorship includes all screen time agreed for those 8 event days.
- 3.2. This sponsorship deal is non-exclusive to Ocean Outdoor and should another provider (meeting the police preferred specification) meet the criteria and wish to work with the MPS on a similar crime prevention / counter terrorism initiative, this offer would be considered.

4. Legal Comments

- 4.1. This proposal seeks approval to accept a contribution of £127k - £150k under S.93 of the Police Act 1996.
- 4.2. Clause 4.8 of the MOPAC Scheme of Delegation requires the Deputy Mayor for Policing and Crime to approve all inward donations and sponsorship £50k and above in value. This project in it's entirety will exceed the £50k limit over the 8 dates.

4.3. The arrangement will be formalised by the documented approval of a S.93 sponsorship agreement. Publication of the agreement will be under the Elected Local Policing Bodies (Specified Information) Order 2011.

4.4. Based on previous advice to the MET third party contracts team, DLS have approved the legal position.

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 project meets its compliance requirements.

5.4. No public data or images are stored by the screens or Ocean Media. The images shown on the screen remain the property of the MPS and Project Servator.

5.5. The MPS will not have access to any of Ocean Outdoor data or Screens directly. All physical equipment will remain under the supervision and be operated by Ocean Outdoor remotely to the site of the deployments

5.6. Project Servator does not use personally identifiable data of members of the public, unless for policing purposes so there are no current GDPR issues to be considered.

6. Equality Comments

6.1. There are not considered to be any equality implications associated with this proposal.

7. Background/supporting papers

7.1. MPS Paper

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	<i>Tick to confirm statement (✓)</i>
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	✓
Director/Head of Service The MOPAC CFO 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

R. Lawrence

Date

18/6/19



MOPAC

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

Ocean Outdoor Counter Terrorism Messaging

MOPAC Investment Advisory & Monitoring meeting.

Report by Sergeant Simon Tagg on behalf of Chief Superintendent Morris

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 accept a free donation of advertising space from Ocean Outdoor to deliver Project Servator counter terrorism messaging to members of the public across London. The purpose of this is to enhance vigilance, amplify partnership working between MPS and private industry and encourage communities to report suspicious behaviour.

Although the screens are provided at no cost the overall value is estimated at £127k therefore exceeding the £50k threshold for delegated authority.

Recommendations

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

- 1. Approval to enter into a donation agreement with Ocean Outdoor on the basis they will provide screenings of Project Servator Counter Terrorism messaging on their outdoor screens at multiple locations with an approximate value of £127k, which will exceed the £50k delegated Authority.**

Time sensitivity

A decision is required from the Deputy Mayor by 21/06/2019. Although there are no legal requirements or deadlines to fulfil, the MPS Project Servator Teams wish to take maximum advantage of the funding especially in the run up to Pride London and summer sporting events commencing in June.

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

Introduction and background

1. Project Servator is a Counter Terrorism Project whose role is to look for Hostile Reconnaissance around crowded places, iconic sites, transport hubs and Government Infrastructure. It is an initiative owned by Centre for Protection of National Infrastructure (CPNI) which is a branch of MI5 designed to target harden areas through visible police deployments, plain clothes tactic and public reassurance encouraging reporting suspicious behaviour.
2. MPS Project Servator Teams also conduct business engagement routine part of their Counter Terrorism deployments. One such engagement was to approach various advertising companies to see if there were any opportunities available to promote the Project Servator and counter terrorism messages to the general public. Without a budget available for outdoor advertising this approach was used to see if there was an appetite to assist with promoting the message.
3. Advertising companies approached were JC Decaux, Outdoor Plus UK, Ocean Outdoor and AdMedia. Only Ocean Outdoor offered advertising space at Zero cost to the MPS. The other companies declined the opportunity apart from JC Decaux who did offer a discounted rate but this was declined as no budget was available to procure outdoor advertising.
4. Ocean Outdoor offered to show Project Servator CT messaging on their "unsold" advertising slots displayed on their public facing screens across the London area at zero cost to the MPS.
5. Ocean Outdoor were established in 2005 and are a private media company who own large outdoor advertising screens such as Piccadilly Circus, Leicester Square, Westfield Stratford / W12 and many other screens nationally. They sell "slots" on their screens to private companies whose adverts show once every minute for a fixed period of time. This offer will allow us to educate the community about Project Servator. It will also inform, reassure and recruit the public to be our eyes and ears in the fight against terrorism by reporting suspicious behaviour.
6. The offer will allow use of screens across Newham Borough at Westfield Stratford, Westminster (Area West) in Leicester Square Screen and Hammersmith and Fulham (Area West) at Westfield W12 on a total of 8 occasions and is valued at £127k.
7. The screens for the 8 events, between June and December 2019 are to be provided at no cost to the MPS.
8. Counter Terrorism is a Metropolitan Police Service Priority, the fear of terrorism affects communities and economy of businesses and UK PLC. Project Servator shows the MPS are visibly committed to fighting terrorism and reassuring the public.
9. The MPS needs to work creatively and constructively with partners and the public. With the availability of 'affordable' technology solutions, it is important that the MPS maximises opportunity from this potential. The use of outdoor screens

to reinforce and amplify the presence of police in the area shows how police have embraced partnership working with private industry to help protect Londoners and adds credence to Project Servator messaging to reach as many people as possible with a small amount of officers deployed. This supports efficient working whilst ensuring the message is seen by thousands of visitors to the locations.

10. The MPS mission is to focus on crime that matters to Londoners and take preventative action. This initiative publicly shows Counter Terrorism Policing teams engaging with the public to deter hostile and criminal activity in the aggregated area. This will help increase public confidence as the MPS will have a strategy to combat terrorism and it will send a clear message to criminals that the MPS is being proactive to deter offences.
11. Three areas of London have been selected:
 - a. Westfield Shopping Centre in Newham – this is an iconic shopping centre and crowded place but also a gateway to the London Stadium for large sporting events throughout the year
 - b. Westfield Shepherds Bush W12 - this is an iconic shopping centre and crowded place but also a gateway to Transport hubs and Queens Park Rangers football club for large sporting events throughout the year.
 - c. Leicester Square / Piccadilly circus – Popular tourist areas, constantly high levels of footfall and lie in the heart of London's West End on the periphery of Soho, Theatre-land, Chinatown and Regent Street they are world renowned locations.
12. Combined with Project Servator deployments we believe that the use of the Screens will give the public confidence to report suspicious behaviour at the time it is happening. This will allow officers to stop and verify suspicious actions at the time of the behaviour. Therefore having the combined effect of saving valuable police investigation time with subsequent secondary investigations.

Issues for consideration

13. The MPS DMC have worked with Ocean Outdoor on a previous occasion for Chinese New year 2019 in Chinatown, at zero cost. This received praise from the Chinatown Association, the Chinese community, the Counter Terrorism Security Co-ordinator for the event and from DAC Lucy D'Orsi for the fantastic partnership working around communities combatting terrorism together.
14. The Digital Media for the screens is already in existence and on file with MPS DMC Ocean Outdoor have no adverse publicity that would make it incompatible to work with the MPS as a Partner.
15. The primary resources used to deliver the project are already in existence. The media to be shown on the screens is in possession of the DMC. The media will sent via email to Ocean Outdoor and then electronically displayed on screens owned and operated by Ocean Outdoor Screens.

Contributes to the MOPAC Police & Crime Plan 2017-2021¹

16. With the current and sustained Severe threat level London as a whole continues to be a target for extremist and terrorist organisations as well as the "lone wolf" type planning, methodology and attacks. This campaign seeks to refresh the message that Counter Terrorism is everyone's responsibility and working together as different communities we can keep London safe. The Impact of an terrorist attack has seen not only devastating human consequences, but longer term issues with fiscal economy with less tourism and public spending. The preventative nature of this project helps to reduce demand and allow resources to tackle other issues of high risk and high harm across London.

Financial, Commercial and Procurement Comments

17. The offer is at zero cost, with no financial impact on the MPS, not taking into account MPS staff/officer time on the project. The financial donation includes all screen time agreed for those 8 event days.
18. The ethical implications of accepting this donation has been considered and there are no known reasons why it should not be accepted. This donation is non-exclusive to Ocean Outdoor and should another provider meet the criteria and wish to work with the MPS on a similar counter terrorism initiative, this offer would be considered.

Legal Comments

19. This proposal seeks approval to accept a contribution of £127k under S.93 of the Police Act 1996.
20. Clause 4.8 of the MOPAC Scheme of Delegation requires the Deputy Mayor for Policing and Crime to approve all inward donations £50k and above in value. This project in it's entirety will exceed the £50k limit over the 8 dates.
21. The arrangement will be formalised by the documented approval of a S.93 donation agreement. Publication of the agreement will be under the Elected Local Policing Bodies (Specified Information) Order 2011.
22. Based on previous advice to the MPS Third Party Contracts Team, DLS have approved the legal position.

Equality Comments

23. Ocean Outdoor will be assessed prior to entering into agreements to ensure they comply with relevant legislation and the procurement process will meet the requirements of the Equality Act 2010 and the public sector equality duty.
24. There is no selection criteria for any of the events and the screens are displayed in a public area, there are no exclusions to the content other than sight disabilities which have the same issues with all public displayed advertising. All the planned events are open public events with access for everyone in the local community. The screens will show public MPS Media which have been deemed

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

suitable for public display and endorsed by CPNI, National Project Servator Media Team at City of London Police and Department of Media and Communications within Metropolitan Police Service. Ocean Outdoor will not advertise their products as endorsed by Metropolitan Police. They may at our discretion state they are working in partnership with Metropolitan Police Service.

25. It could be said that people attending events are receiving an enhanced police presence. Project Servator deployments are carried out in the run up to events as a matter of course across London as business as usual. Sporting events at those locations have had existing visible policing plans in the past, the presence of police is not extra-ordinary.
26. The screens are in the public areas not only for ticketed persons, the area will be crowded and the need for vigilance for suspicious behaviour may well come from organised and opportunistic criminality such as pick pocketing and robbery not only terrorist threat. The screens will be on display to a variety of members of the community. The media seeks to reassure and ask them to report any behaviour to police or staff. As it speaks to such a wide cross section of the community and is not specific about what "suspicious behaviour" might be it is therefore not discriminating against any protected characteristics.
27. Some people who hear about this initiative or become aware of Project Servator and may want to request deployments for their own operations. If this happens, they would be advised to inform the MPS about their event via the MPS Website and request contact with their local CT Protect Team. They will assess the event and assess the need through Protective Security Operations for us to deploy.

Privacy Comments

28. 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.

The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.

29. No public data or images are stored by the screens or Ocean Media. The images shown on the screen remain the property of the MPS and Project Servator.
30. The MPS will not have access to any of Ocean Outdoor data or Screens directly. All physical equipment will remain under the supervision and be operated by Ocean Outdoor remotely to the site of the deployments.

31. Project Servator Officers deployed around the screens may ask questions of the public to gauge generic feedback about the digital imagery as part of the public reassurance messaging. The officers will not record personal details of any persons.. No personal details recorded in an official policing capacity will be passed onto Ocean Outdoor.
32. Project Servator does not use personally identifiable data of members of the public, unless it's for policing purposes so there are no current GDPR issues to be considered. No personal data will be gathered on behalf of Ocean Outdoor nor disseminated. Personal details will only be shared with other Law enforcement agencies and only then for policing purposes.

Real Estate Implications

33. There are no anticipated real estate implications. All physical equipment / hardware is currently in place. The displayed media is digital and exchanged via email.

Environmental Implications

34. There are no environmental implications for this event. The screens would be powered and used for advertising as a matter of course whether MPS Media was displayed or not. The Screens are high resolution, but low energy consumption a

Background/supporting papers

35. None.

Report author: [Simon Tagg PS 5374SO, Project Servator](#)

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 would be:
OFFICIAL-SENSITIVE [COMMERCIAL]

There is no sensitive information in relation to this proposal.