



Inspecting policing
in the public interest

Strategic Policing Requirement

City of London Police

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Introduction

The *Strategic Policing Requirement* (SPR) was issued in July 2012.¹ This document sets out the Home Secretary's view of the national threats that the police must prepare for and the appropriate national policing capabilities that are required to counter those threats. The SPR respects the operational independence of the police service, advising what, in strategic terms, it needs to achieve, but not how it should achieve it.

The particular threats specified in Part A of the SPR, and referred to as the national threats in this report, are:

- terrorism;
- civil emergencies;
- organised crime;
- public order threats; and
- large-scale cyber incidents.

Part B specifies the policing response that is required nationally, in conjunction with other national agencies, to counter these threats. This policing response is described in the SPR as follows:

*“the combined national **capacity** of all police forces to respond to these threats, expressed in terms of the outcomes sought – these are drawn, wherever possible, from publicly available national government strategies. Police and crime commissioners and chief constables must have regard to this aggregate capacity when considering the respective **contributions** they will make to it;*

*the **capabilities** that police forces, often working collaboratively, need to maintain in order to achieve these outcomes; the requirement for **consistency** among forces for certain key specialist capabilities where the resources from more than one police force need to be integrated with, or work effectively alongside, each other. In some instances this requirement for consistency may need to involve other key emergency services and agencies; and*

*the **connectivity** arrangements by which resources from several police forces may effectively be co-ordinated or mobilised, together and with those of other agencies – such as the Security Service and, from 2013, the National Crime Agency. The combination of consistency and*

¹ In accordance with section 37A Police Act 1996. Available from <https://www.gov.uk/government/publications/strategic-policing-requirement>

connectivity forms the basis for interoperability between police forces and with other partners.”

We report the findings from this inspection of the City of London Police which took place during September 2013 against each of these requirements.

The breadth of requirements that are set out in the strategic policing requirement are outside the scope of a single inspection. Therefore, it has been necessary to plan a series of inspections over three years so that the police response to all the national threats can be examined individually and in-depth over that period.

This year, HMIC has examined how well police forces have established arrangements to respond to strategic policing requirement threats and has conducted in-depth examinations of the police response to two of the national threats: the threat to public order; and the threat of a large-scale cyber incident.

We have produced the following three national reports, available at www.hmic.gov.uk:

- The Strategic Policing Requirement: An inspection of the arrangements that police forces have in place to meet the requirement;
- The Strategic Policing Requirement: An inspection of how police forces in England and Wales deal with threats to public order; and
- The Strategic Policing Requirement: An inspection of how police forces in England and Wales deal with threats of a large-scale cyber incident (including criminal attack).

This report sets out what we found when we examined the arrangements that the City of London Police has in place to meet the strategic policing requirement and follows the format of the first of the national reports listed above.

Capacity and contribution

Terrorism

With the support of a London wide agreement, the force has the capacity to support all four strands of the government's counter-terrorism CONTEST² strategy.

The Commissioner understands his role in tackling the threat of terrorism and this commitment is clearly outlined in the Policing Plan (2014-17) where the protection of the City of London from terrorism and extremism is described as a key priority for the force.

Counter-terrorism policing in England and Wales is co-ordinated by the national counter-terrorism network. This is formed of dedicated policing teams who gather intelligence and evidence to help prevent, disrupt and prosecute terrorists.

There is a dedicated intelligence unit in the City of London Police which links into the counter-terrorism network through working with the Metropolitan Police Service (MPS) counter-terrorism command, the British Transport Police (BTP) and other organisations. At a local level, we found good working relationships with the seven Metropolitan Police Service boroughs that adjoin the City of London.

The force considers the threats and risks from international terrorism and domestic extremism as part of its strategic threat and risk assessment and allocates resources accordingly. As part of the counter-terrorism network across London, the force has the capacity it needs to contribute to the national counter-terrorism effort.

Prevention is one of the main elements of the CONTEST Strategy, engaging with communities to identify individuals who may be vulnerable to radicalisation. Nationally the focus for prevention has been residential communities; however the City of London has only 10,000 residents but host in excess of 300 000 day time workers and tourists. The force has therefore adapted its prevention activities into the business environment so that people vulnerable to radicalisation can be identified and assessed through multi agency engagement.

² CONTEST – the government's counter-terrorism strategy. The four strands are: pursue, prevent, protect and prepare.

Civil emergencies

The force, together with the London local resilience arrangements, has the capacity to respond to local civil emergencies and to contribute to national emergencies.

The force works closely with other services to plan and prepare for responses to civil emergencies at a local level and across London. Its contribution and commitment is driven by the Commissioner who sits on the local resilience forum in the City of London and also the London Resilience Partnership. These forums assess the potential hazards and threats to London and identify the capabilities that are needed to deal with them. The Commissioner has also worked with the London Corporation to develop plans to deal with a mass evacuation of the city.

The London Resilience Partnership is a coalition of organisations from across the capital, including all the emergency service providers. It is made up of more than 170 organisations and the City of London Police, along with the MPS and BTP, play a major role in preparing, responding and recovering from emergencies in London. The partnership have developed a London Resilience Team which supports the force, and other organisations, by planning for, and co-ordinating responses to, major emergencies. Its responsibilities include the development of risk assessments for known and foreseeable risks and events.

The City of London Police has considered the likely threats that it may face from civil emergencies, but it has not produced a strategic threat and risk assessment. Instead, the local resilience forum, working with the City of London Corporation, has prepared the city risk register, which is published on the City of London Police's website and describes risks that the city may have to deal with. It is dated 2013.

In addition, the four police forces with a presence in London (the Metropolitan Police Service, City of London Police, British Transport Police and the Ministry of Defence Police) have agreed how they will mobilise and share resources to respond to incidents faced by either one of them under a protocol called Operation Benbow. This mobilisation arrangement is well tested and provides the forces with timely additional resources to deal with civil emergencies and large scale public events.

The City of London has sufficient numbers of trained staff to deliver chemical, biological, radioactive and nuclear capabilities.

Serious organised crime

The City of London Police has the capabilities required, either internally or through officers provided by the MPS and the London regional organised crime unit, to meet threats from serious organised crime. The City of London Police has a national responsibility for policing economic crime and hosts the National

Fraud Intelligence Bureau (NFIB) which has responsibility for the identifying and disrupting all types of fraud, including those committed by organised crime groups.

Serious organised crime is considered within the force's strategic threat and risk assessment. It has an Organised Crime Group (OCG) mapping process which is overseen by a monthly OCG Review Board. There is specific focus on those groups using fraud to cause harm and police interventions are used to disrupt these groups and prevent further harm being caused.

The force applies nationally approved methods to disrupt the most serious organised crime groups. The force holds task-allocation meetings to agree what is dealt with by the different levels of response (local, regional or national). It also works well with the chair of the police committee who has nominated a member of the committee to lead on issues relating to serious organised crime.

The force is confident that its capability to tackle serious organised crime will continue to be effective in the current climate of austerity. However, it has recognised that the London Regional Organised Crime Unit (ROCU) could more effective if additional contribution was added to the collaboration with the Metropolitan Police Service and the British Transport Police.

Public Order

The City of London Police has the capabilities required to respond to public order threats. It has sufficient specialist public order staff³ and senior officers to command responses to major events and public disorder.

The force has completed a public order strategic threat and risk assessment which shows the known and foreseeable threats facing the force and has enabled them to set their resource levels accordingly. Its contribution to regional and national mobilisation has been considered in this process. It works closely with the MPS and the BTP under Operation Benbow⁴ to ensure there are sufficient resources available to meet its public order demands and to mobilise quickly in response to any escalation of disorder.

The force plays an active role in the regional public order committee, which is chaired by an assistant commissioner from the MPS. This group provides strategic co-ordination for London's public order capability and the chair represents the London region at a national level.

³ In addition to public order trained police officers, forces have specialists who are trained in a number of capabilities. These include liaison with protestors to facilitate peaceful protest and the removal of uncooperative protestors causing obstructions.

⁴ Operation Benbow, commonly referred to as 'Benbow', is an agreement between the City of London Police, Metropolitan Police Service and British Transport Police to pool policing resources under one Gold Command in order to effectively police an operation in London. Benbow can be implemented on a pre-planned or reactive basis.

For each force, HMIC compared the number of police support units⁵ they declared they had, with the number of police support units that they told us they needed to respond to local outbreaks of disorder. The force assessed that it needed three police support units to respond to local threats and has trained three. The force can provide the two fully equipped police support units it requires to contribute towards national mobilisation.

The use of mutual aid (the provision of support between police forces) is another indicator of the extent to which police forces either have or do not have sufficient trained public order resources. Data provided by forces on their provision and receipt of mutual aid for 2011/12 and 2012/13 show that the City of London Police was one of 12 forces that were net recipients for public order policing mutual aid.

Large-scale cyber incident

The City of London Police response to the threat of a large-scale cyber incident is still under development. At the time of HMIC's visit to the force, an action plan was being prepared to define how the force will respond to cyber issues. It was recognised that, at the time of the inspection, it had limited capacity and capability to deal with such an incident.

We found that there was no strategic threat and risk assessment covering a large-scale cyber incident and the force has not assessed the threats and the potential of a denial of service attack⁶ on its own systems. A force information security officer conducts yearly tests to see whether the force's systems can be compromised. The last test took place in November 2013 and was performed by an external contractor.

The force had prepared business continuity plans⁷ to enable it to continue functioning in the event of disruptions to services, including its information technology systems.

⁵ Police support units are the basic formations used by the police service for the policing of major events. The composition of a police support unit is standardised across all of the 43 police forces in England and Wales and consists of one inspector, three sergeants and 18 police constables, plus three drivers trained and equipped to carry out public order tactics to national standards, with three suitably equipped personnel carriers. Formations of a sergeant and six constables are referred to as serials.

⁶ A denial of service attack is an attempt to make a computer or network of computers unavailable to its users.

⁷ Business continuity plans set out how the force will operate following an incident and how it expects to return to normal business in the quickest possible time afterwards.

Capability

Terrorism

The City of London Police has, or has access to, the necessary capability to conduct complex investigations into terrorism. It has the systems in place to manage the training of special branch officers to maintain the necessary skills to provide specific counter-terrorism capability.

The force works closely with the MPS to ensure that all available information, from across London, is gathered and analysed. This provides intelligence that informs regional and national understanding of terrorist and domestic extremism threats.

Through a localised agreement, the MPS counter-terrorism command provides most of the capability needed to undertake complex investigations, including the provision of counter-terrorism senior investigating officers, responses to critical incidents (including command and control), and the provision of specialist equipment and training to national standards. The City of London Police has its own dedicated counter-terrorism intelligence function which contributes to the work of the MPS counter-terrorism command.

In 2004 the City of London Police developed Project Griffin⁸ with an aim to engage, encourage and enable members of the community to work with the police to deter, detect and report terrorist activity and crime. Since then, 23 forces in the UK either currently operate a Project Griffin programme or have previously done so. More than 30,000 people have attended Project Griffin events. The feedback from these events has shown that the programme has raised greatly attendants' awareness of counter-terrorism issues.

Civil emergencies

The force is meeting the strategic policing requirement to provide capability to meet civil emergencies which spans the borders between City of London and surrounding forces.

Resilience planning has taken place in conjunction with the local resilience forum, and the force has assessed its capacity and capability against the roles identified within these plans. The London emergency services liaison panel is nationally recognised as being a highly effective model for emergency services

⁸ Project Griffin is an initiative, led by the police promoting activity between businesses, trusted partners, and other statutory organisations. It seeks to protect communities against the threat of terrorism and aims to achieve this by offering a multi-layered approach to counter-terrorism awareness, incorporating security personnel or any other public facing members of staff.

joint working. Role-specific training is provided through this forum and the force maintains records of training provided to staff.

The London Resilience Team provide a 24/7 liaison point for central government, other local resilience forums in the United Kingdom and bodies performing similar roles overseas. As part of its responsibilities, the London Resilience Team manages action agreed by the local resilience forum and acts as a conduit for the sharing of information between partners.

There is a dedicated unit available to respond to chemical, biological, radioactive and nuclear incidents and sufficient numbers of trained staff through a collaborative arrangement with the MPS. The force also works closely with the MPS, BTP and other London emergency services in planning, training, exercising multi-agency responses to civil emergencies.

The assistant commissioner attends the internal business continuity steering group meeting that links with the local resilience forum every three months.

Serious organised crime

The City of London Police has the capabilities required, either internally or through officers provided by the MPS or the London ROCU, to meet threats from serious organised crime.

The force included considerations of serious organised crime within its strategic threat and risk assessment. Senior leaders recognise the potential consequences of serious organised crime, particularly relating to economic crime, and the need to further develop its understanding of the threats.

Staff are trained to national standards and have appropriate equipment to fulfil their roles. Training requirements are reviewed annually and records of staff skills are maintained and accessible.

The force leaders understand that, as a small force, it will need a joint approach with the MPS and the BTP to maintain all of the capabilities needed to tackle organised crime groups. They have identified the areas where it may need help and have reached agreements to obtain assistance when required, both in relation to staff and the use of technical and surveillance resources.

Public order

The City of London Police has the capabilities required to respond to public order threats.

The force trains its staff at its training establishment in Gravesend. Training meets national standards and includes initial training, mandatory refreshers twice a year and training for public order commanders.

Skill levels, training and succession planning for when staff leave, are managed effectively by the force planning team. Analysis of demand is carried to consideration to the number of staff trained across the force in order to maintain capability. The force has trained a larger number of staff for public order than is required to meet its assessment of local threat, or to meet national mobilisation requirements. Senior leaders state that these numbers of staff provide the force with operational resilience in policing part of the capital city.

The force keeps effective police support unit records which link directly to the duties management system. Public order skills, as well as all driver qualification and chemical, biological, radioactive and nuclear training, are able to be viewed quickly across the force.

The force has introduced Real-time Intelligence Officers (RIOs) in the control room to provide timely intelligence to operational leaders during the policing of major public events or if large scale disorder breaks. This enables them to use up-to-date information to plan tactics and deploy resources.

The force exercises its public order officers regularly alongside the MPS support units and is fully interoperable with them in terms of training, tactics and equipment. The force tested its ability to mobilise public order trained staff two years ago prior to the Olympics.

The City of London Police has reviewed the number of officers with skills that it needs to perform specific roles and assessed that there are no gaps. HMIC tested, without notice, the force's capability to mobilise and conduct mutual support across boundaries to outbreaks of public disorder. The control room staff demonstrated effective ways of identifying resources and managing their response to the scenario given in the test.

We found that there were plans to establish separate command, control and communications provisions as part of the respond to the incident. An inspector trained in commanding police responses to public order incidents was available immediately, as was a senior officer who was empowered to mobile resources and co-ordinate a longer term responses. One fully equipped police support unit was available within five minutes and there were plans to secure further serials from elsewhere in the force area within 45 minutes. The control room staff demonstrated a clear understanding of the standard operating procedures for mobilising the force and the option available through Operation Benbow, if further assistance was required.

As part of the inspection we examined one of the force's police support unit carriers and found it to be fully functioning and equipped to national standards.

Large-scale cyber incident

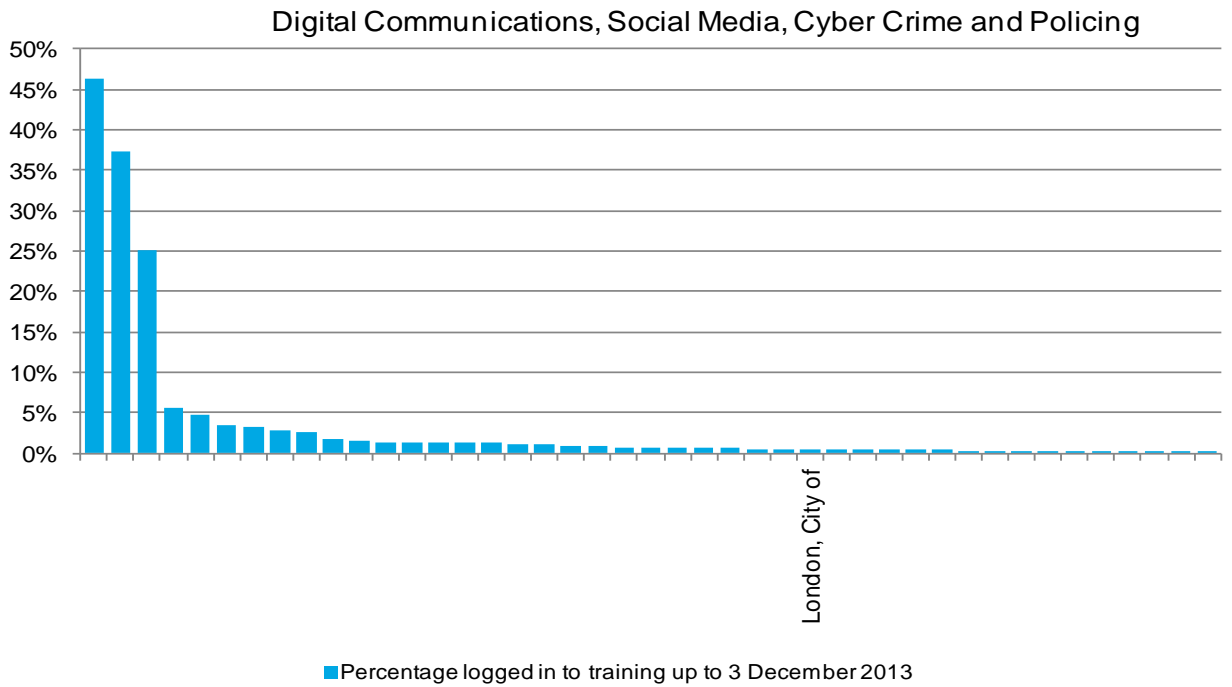
The City of London Police, like most police forces, was unable to demonstrate a clear understanding of the threats, risks and harm posed by cybercrime. As a consequence it has not yet taking full advantage of opportunities being made available to train its staff to deal with cybercrime. The force was working to improve its understanding of cyberspace crime and its ability to respond to a cyber attack, including the development of an action plan to outline where investment was needed.

Although capability was limited, the hi-tech crime investigators (staff who investigate cybercrime) have been trained to nationally agreed standards. The force would benefit from working more closely with academic institutions and private industry to recruit additional people with IT skills or seek assistance from volunteer technology professionals. This would improve the force's skills base and give additional capacity and capability in this area.

The College of Policing has developed eight computer-based training courses to improve the police service's knowledge and skills to deal with cybercrime. Data has been provided and analysed to understand the proportion of the workforce who have sought the training up to the beginning of December 2013.⁹ Information showing the proportion of staff, for each force, who have signed in for the training are included in our national report on the police service's response to cyber threats. The following charts demonstrate how many of the City of London Police's workforce enrolled for three of the eight e-learning courses designed to improve awareness. These courses were selected to be representative of the force's commitment to improve the knowledge and awareness of frontline policing resources. The Digital Communications, Social Media, Cybercrime and Policing course was introduced in April 2013 and Cyber Crime and Digital Policing – Introduction, in August 2013. The introduction to Communications Data and Cybercrime, for specialist investigators, was introduced in July 2011.

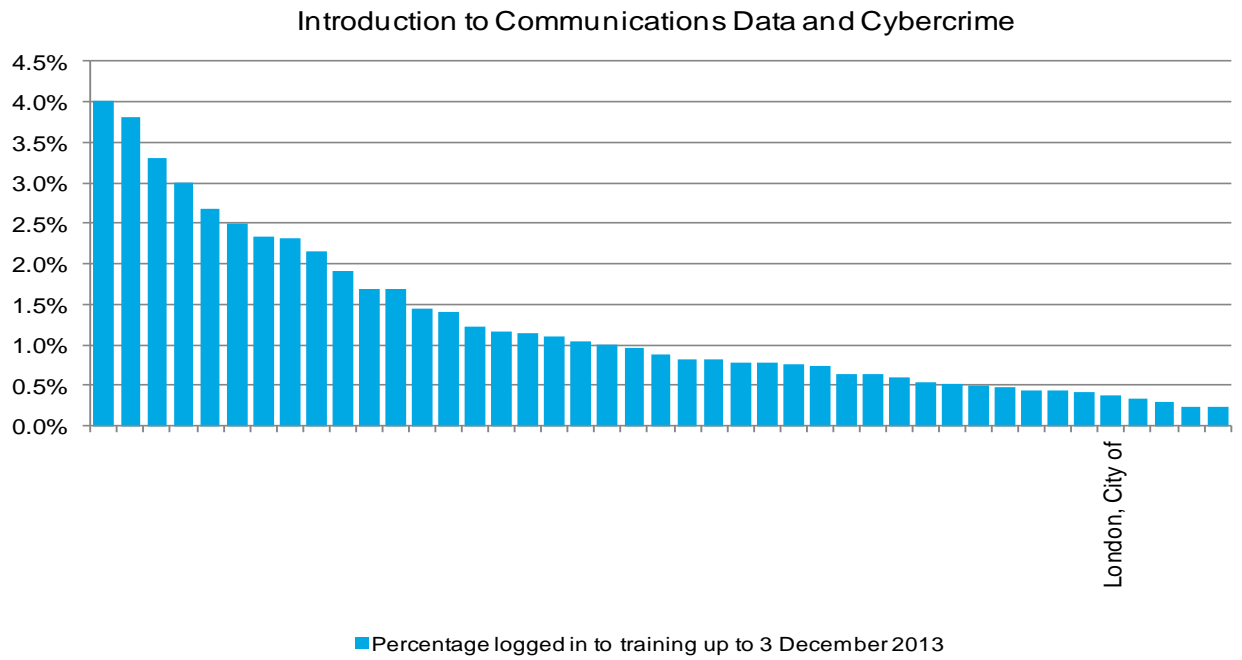
⁹ Information provided by the College of Policing dated 10 February 2014 - Completion figures for Communication Data and Cyber Crime Modules (Period Ending 31 January 2014).

Figure 1: Digital Communications, Social Media, Cyber Crime and Policing¹⁰



¹⁰ This course aims to develop awareness of digital communications technology and its impact on different areas of cybercrime, social media, law enforcement and policing.

Figure 3: Introduction to Communication Data and Cybercrime¹²



¹² This course is aimed at investigators and demonstrates the skills needed for a basic level of understanding of the uses of communications data within law enforcement including guidance on cybercrime prevention.

Consistency

Public order

The City of London Police trains public order officers and procures public order equipment using nationally agreed standards, in order to be consistent with the other forces in London.

Public order equipment is purchased through the national procurement framework and is compatible with the MPS. The force applies national standards for its public order protective shields and force procurement staff contribute to national discussions about the standards of public order equipment. Staff trained in public order expressed confidence that their equipment was up to date and compatible with that used by other forces.

There is consistency in the tactics taught and interoperability of the forces' public order capabilities has been tested on numerous occasions, working alongside those from other forces. Leaders within the organisation are confident that their officers can work well with resources from other areas across England and Wales. It was identified however, that differences in the types of shields used by forces outside London may cause some operational difficulties for national level mobilisation.

The force also outlined some differences in the training of public order commanders and how they fulfil their responsibilities. These differences include the way that leadership of overall tactical responses is organised. For example, London forces use one overall tactical commander for each event, irrespective of the size and scale, where other forces use multiple commanders to perform the same role.

The force trains senior police officers to command the policing of public order events at three levels – strategic command; leading the overall tactical response; and commanding the policing of geographic areas or specialist capabilities. Public order commanders are provided with training and development to become competent at all three levels.

Responding to chemical, biological, radioactive and nuclear incidents

HMIC found that interoperability between City of London Police, the MPS and other emergency services to provide the force's chemical, biological, radioactive and nuclear (CBRN) capability is effective.

Specifications for the equipment used to respond to CBRN incidents are mandated nationally and the force uses the national procurement framework to purchase the appropriate equipment. Officers training also follow the national standards to ensure that the practices used by the force are consistent with

other police forces and wider emergency services. The Home Office is reviewing specifications for police CBRN equipment and senior leaders with the City of London Police are contributing to this review.

HMIC found that there had been no chemical, biological, radioactive or nuclear mobilisation exercises in the last three years.

Connectivity

Terrorism

The City of London Police has effective ways to co-ordinate and mobilise resources to deal with incidents of terrorism. These are supported by secure information technology and radio communication systems.

The force participates in a daily national call system and a fortnightly security review committee, chaired by the MPS, at which threats are discussed and the police service's response is determined. There are clear arrangements in place for the force to access resources or request assistance from the regional and national counter-terrorism network.

The force has the capability to sharing information securely with the security and intelligence services, government agencies and other police forces. There is effective communication using the Airwave radio system.

Civil emergencies

The City of London Police is able to communicate with other local resilience forum members in the planning of responding to civil emergencies.

Emergency services in the city area work with the national joint emergency services interoperability programme, and the force has a very strong relationship with other agencies through the London emergency services liaison panel arrangements.

Relations are particularly strong with other category 1 responders¹³ across London. For example, staff from the fire and rescue, and ambulance service, attend joint training sessions to work with police officers and develop a co-ordinated response to public disorder. Ambulance and fire and rescue service staff can also communicate with the police using the same radio channels.

The local resilience partnership has undertaken two theoretical exercises for strategic commanders from each of the main member agencies. Scenarios have been based upon assessments of threats that the forum is facing, for example, flooding. Reviews of these exercises have identified some areas for improvement and development plans are being managed accordingly.

¹³ Category 1 responders are described by the Cabinet Office as organisations at the core of the response to most emergencies (the emergency services, local authorities, National Health Service) defined by the Civil Contingencies Act 2004) – www.gov.uk.

Serious organised crime

The City of London Police communicates effectively with other forces in London and with the London ROCU to agree the mobilisation of shared resources, including technical equipment, staff and tactics.

Through its collaboration with the MPS, the force has an effective way of responding to organised crime threats that require timely and focused operational activity, including the co-ordination of an action agreed with the National Crime Agency.

Across London, there are a number of forums within which senior leaders from different law enforcement agencies meet and discuss potential overlaps activities and tactics. These meetings are used to discuss, test and agree strategies between the different organisations. HMIC found evidence that leaders were making risk based decisions to ensure that resources were prioritised to deal with the most serious organised crime groups.

The equipment used in operations to tackle organised crime groups is purchased by the force's procurement unit. This unit collaborates with the MPS to ensure that assets are shared and that technical equipment is used efficiently.

Public order

The City of London Police is an active participant in the arrangements for cross-boundary mobilisation of officers to deal with public order incidents.

The MPS is responsible for co-ordinating public order resources across London through a formalised agreement called Operation Benbow. This provides a protocol for the rapid mobilisation of police support units in response to spontaneous events. The co-operation also extends to some pre-planned operations, including the policing of large scale public events.

The force has contributed resources to police major events on a number of occasions and has well-practised plans to do so. In the past two years, the force has received assistance in the form of six¹⁴ police support units. The force, in turn, has provided four police support units to others.

¹⁴ This analysis excluded three major policing operations – the 2011 widespread disorder experienced

in England in August 2011, the London Olympics 2012 and the removal of the residents at Dale Farm,

Essex in 2012 (Operation Cabinet) – as they were exceptional incidents that skewed the results.

Cyber connectivity

The City of London Police has not been faced with a large-scale cyber incident that would require a joint response. Staff within the control room were aware of where they could get help from, if it was needed, and what resources were available through the collaborative arrangements with the London ROCU and the MPS.

The force has not had to investigate or deal with the consequences of a serious cyber attack. Senior management in the force recognise that, if faced with such a challenge, they would require expertise and support from the National Cyber Crime Unit within the National Crime Agency (NCA). This provision has recently transferred to the NCA from the MPS and arrangements for mobilising resources to support police forces, in response to a critical incident, are still being developed.