

**COUNCILLOR STEPHEN ALAMBRITIS**  
**LEADER OF THE COUNCIL**  
(Labour, Ravensbury Ward)



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Date: 6 March 2013

Dear Stephen,

**The London Borough of Merton's official response to the consultation on the Draft Mayors Police and Crime Plan 2013**

The London Borough of Merton would like to formally respond to the above plan in writing. We have not used the on line form as it does not enable us to highlight our key concerns as we would wish. We have nevertheless attached responses to the questionnaire as Annex 2, as part of this submission.

In responding to the consultation, the council welcomes the general principles of focussing on street policing, retaining high numbers of police, increasing visibility, improving public access, and increasing public trust. However we are not convinced that the plan will achieve these aims. Nor are we convinced that the 20/20/20 model represents evidence based improvement targets, or is anything other than meaningless sloganising. Crucially, we do not accept that the plan itself is anything other than financially driven, necessitated by government cuts in funding which we do not support, and which will be to the detriment of policing and public safety in London.

In that context, we would set out our key concerns as follows:

- 1. The reduction in officer numbers in Safer Neighbourhood Teams is unacceptable and unnecessary, and will lead to a rise in crime levels, a loss of public trust, and a reduction in local intelligence gathering.**
- 2. The proposed ending of the 24 hour front counter at Mitcham police station is to the detriment of residents in that part of this Borough.**
- 3. The closure of local Safer Neighbourhood Team offices is to the detriment of local residents and diminishes efforts to reduce the fear of crime.**
- 4. The proposed removal of custody from Merton to joint custody with Sutton, based in Sutton, is to the detriment of policing in Merton, of local authority services, and of Merton's residents.**

- 5. The requirement for a substantial cohort of officers to be transferred from “other duties” to neighbourhood policing in order to achieve the target figures for the latter, with no recognition of this requirement in the plan, no strategy for achieving it, and no opportunity for respondents to comment accordingly.**

### **Safer Neighbourhood Teams**

This Council believes the 1:2:3 model of Safer Neighbourhood Teams to have both reduced the levels of crime in Merton, and to have increased the public's trust in the police, and increased their sense of safety.

The high visibility of SNT police and PCSOs, with individual officers known to the community to which they are attached, and engaging with residents of all ages, has created a high level of public trust in those officers. It has discouraged criminal and anti-social activity because of the greater likelihood of being caught in the act, or being reported by the public, and has increased the willingness of residents to provide information on that activity.

The proposed reduction to a 1:1 model, a single police officer and one PCSO in each ward, albeit it with named, but potentially shared sergeants, will reduce the frequency of patrols, and the number of known officers, to a point where the positive impact of SNTs will be seriously damaged.

Where the plan claims to increase the number of neighbourhood officers, it does not set out any detail on how these officers will be deployed. Page 14 of the plan refers to teams and units over and above the depleted 1:1 SNTs, but does not give officer numbers or the operational methodology for those teams.

In Merton, the 1:2:3 model across 20 wards delivered 60 police officers in SNTs, (and 60 PCSOs). Under the plan, by 2015, Merton will have 107 police officers attached to “Safer Neighbourhoods”, (Page 16), although only 20 of these will be in the new 1:1 model, ward based SNTs. This leaves 87 police officers unattached to individual wards. In fact the proposed increase in Neighbourhood officers would permit the retention of the 1:2 police officer element of the 1:2:3 model, with 60 of the 107 police officers still attached to ward based SNTs, and the remaining 47 additional police officers undertaking the new “Safer Neighbourhood” roles that Page 14 outlines.

The plan does not set out any detail on the provision of PCSOs, who currently constitute one half of the existing SNT's, but does provide for one PCSO attached to each ward. Even at this level, the above suggestion would deliver a total of 4 officers for each ward as a more effective SNT than the plan proposes. The retention of 3 PCSOs per ward would of course be preferred.

In summary, if the increase in Safer Neighbourhood police officers set out in the plan, from 58 to 107 in Merton, represents a genuine increase in officer numbers on the streets, there is no reason why the police officer element of the 1:2:3 model should not be retained. This would minimise the potential damage to trust and confidence, and to levels of crime and anti-social activity.

### **Police Front Counters**

We would wish communities to be treated equitably, and in Merton we would express a particular concern that residents in Mitcham should not receive a second class service by comparison with those in Wimbledon. For this reason we do not accept the proposal to end 24 hour opening at Mitcham police station.

Further, we note that where neighbourhood offices have a visible presence in the locality, and are open to residents, we believe that this is valuable in creating a positive perception of the area as a whole, and in reducing criminal and anti-social behaviour. We would not support the disposal of these offices.

## **Custody**

We wish to reiterate our concerns about custody (currently on borough) being moved to Sutton. This is not something that we can support in any way. You may be aware of a previous trial of this arrangement, which was not a success either in regards to policing of the borough or safeguarding children and/or vulnerable people.

The trial arrangement also highlighted that to remove custody from the borough actually 'shunts' cost to the council and puts an additional and unacceptable financial and resource burden on already stretched services. This is self-evident, with the increased journey times for children's services officers, the Youth Offending Team, adult social care officers, mental health officers, and the drug intervention team. A parallel concern is that increased journey times for Merton police officers to and from a Sutton custody suite will detract from the level of time spent on patrolling the Borough's streets, thereby militating against one of the plan's key aims.

Of equal concern is the disadvantage to young people, and vulnerable adults, including those with learning difficulties, mental health needs and drug and alcohol issues, and for their families, friends, and those supporting them, in removing those in custody from the Borough.

Attached as Annex 3, is a more detailed analysis of the trial arrangement, and the detriment of any such arrangement. This highlights the specific issues that arose when joint custody with Sutton was previously piloted. It is noted that only three boroughs in London will not have their own custody suits. We have been informed that Merton is likely to be one of the three boroughs. This policy negatively and disproportionately affects the boroughs disadvantaged by this proposal.

In view of the import of this proposal, in the event that MOPAC propose to take it forward, we would request formal dialogue prior to any final decision to implement.

## **"Other Duties"**

The plan claims to provide over 2,600 additional officers in Safer Neighbourhoods - although not in ward based SNTs, (see above) – than in October 2011 (Page 14). How these officers will be provided is unclear. The table on Page 16, setting out police numbers in each Borough, confirms this, totalling the additional Neighbourhood officers at 2642. However the same table shows the total number of additional officers covering all duties as being 1182.

Whilst the claimed increase of 1182, if achieved, will be welcome, this leaves a shortfall of 1460 officers required to provide the additional Neighbourhood strength. This can only be achieved by removing those 1460 officers from other duties that they are currently performing. No information is provided as to how this will be done, what other duties will be affected, or how this will impact on the performance of Borough level policing.

In Merton, using the table's figures, there are currently 58 SNT officers, and 344 officers in total. The 2015 target is 107 Neighbourhood officers, and 356 in total. Setting aside queries about the 2011 figures used, this means an increase of 49 officers attached to Neighbourhoods, with an overall increase of only 12 officers

for the Borough. In consequence 37 officers will need to be removed from other duties in Merton to make up the number for Neighbourhoods.

Not only has no information been provided as to how this will be achieved, it would appear that neither the MPS nor MOPAC currently know how to deliver on this. Our understanding is that our Borough Commander has been instructed to put forward his proposals to MPS by 6 March 2013, as have Borough Commanders across London.

We have serious concerns about the unknown impact of these proposals, and at a consultation process based on such a substantive unknown at the centre of its plan, some 1460 officers across London to be removed from their current duties to supplement Neighbourhoods.

This gives little confidence in the plan as a whole. Given that the deadline for responses to the consultation process is precisely the same date by which Borough Commanders are required to submit their proposals, this makes it impossible to provide a full and considered response to the consultation process.

Under the circumstances we formally request that once the MPS has formulated its proposals for redeploying this number of officers from "other duties", a further consultation exercise is carried out enabling local authorities and other stakeholders to comment on those proposals.

### **Summary**

This covering letter having set out the major concerns that we wish to express, please find attached as Annex 1, further concerns of a more general nature, as Annex 2, additional responses to the specific questions in the consultation questionnaire, and as Annex 3, further comment on the custody issue detailed above.

Yours sincerely

**Councillor Stephen Alambritis**  
**Leader of the Council**

**Councillor Edith Macauley**  
**Cabinet Member for Community Safety, Engagement and**  
**Equalities**

## **Annex 1**

### **Overarching concerns about the document:**

Community Safety Partnerships, and their role in working with MOPAC and directing community safety work within London boroughs, do not appear to be referred to in the document. We greatly value these partnerships and wish to retain their role in delivering and directing work around community safety and the delivery of crime reduction?

Although 'gangs' and young people are mentioned within the priority areas of work there is no reference to the Met's commitment to MASHs across London, linkages with Children's Services and/or Children's Trust Boards. We value these linkages and would wish to see the retained.

Health and Wellbeing Boards are mentioned within the document. We would wish to see the linkages with these boards clearly defined,

The 20/20/20 slogan used within the plan leads us to emphasise the import of MOPAC assessing the potential/actual impacts of its proposals on crime figures, potential partners and quality of service. We would wish to see a clear strategy in place to provide this. We would also expect that MOPAC would be responsive to any deterioration in service due to the estates strategy, and have in place contingency plans in order to rectify this should it occur.

The estates strategy is juxtaposed with some of the core principals in some areas. There appears to be no consideration given to 'cost shunting' and there could appear to be an assumption that partners will 'foot the bill' for police bases. We trust that MOPAC has set aside an appropriate financial envelope to finance working from alternate locations, and would not accept liability for any additional costs.

## Annex 2

### Responses to questions as per the consultation questionnaire :

1. *What objectives/goals do you want added?*

There appear to be 30 priority objectives/goals listed within the various sections of the consultation document. This devalues the sense of the term “priority”. We have no specifics to add to this list.

2. *What else can we do to tackle performance and resource?*

There is little consideration given to the work delivered by any other partner, apart from the police. By building on the existing good practice around partnership working you would be able to combine performance and resourcing regimes.

The document is only forward facing and does not look at the exemplar work that has gone on over the past few years and how to share this further in line with sharing best practice.

The plan has the appearance of a short term strategy We recommend looking at non-cashable savings as an outcome, reducing the costs to statutory agencies across the crime and disorder field over the long term. . Protecting communities in the longer term should also be an outcome.

3. *Does confidence in the police need improving?*

You state in your own document that it does. However this is a perceptual measure and ‘communities’ often do not know where the police responsibility ends and other agencies’ ownership starts. Therefore increasing confidence in the police will require strategies around communicating the nuances or increasing linked services.

4. *Bobbies vs Building – good idea?*

In principle we support this, but have expressed specific reservations in our covering letter, in particular where it shunts costs to other areas or where it is likely to lead to an increase in crime and poorer services and is simply a cost cutting exercise. See also Annex 3 on custody for further clarification.

5. *What else can we do to prevent crime?*

Build on the successes that are already in place in London and learn from these. Work in partnership (an element lacking within the strategy document and the planned policing model).

6. *What else would you include as priorities?*

It would appear that you have more than enough priorities in this document, however every year each borough undertakes a strategic assessment as to the direction and needs of their area. MOPAC should use this resource when identifying pan-London trends and needs.

7. *What else could be done to address justice and resettlement issues?*

Currently the MOPAC plans do not include any provision for the continuation of PPO/IOM work (there are no dedicated police resources for this field of work). Successful IOM/PPO work is delivered in partnership. Without the dedicated police resource for these projects the delivery of ‘wrap around’ services will not

be as successful and this will disadvantage the delivery of justice, resettlement and reduction in re-offending work undertaken locally.

Pan-London agreements in regards to the resettlement of offenders and funding to support the bespoke needs of higher risk individuals needs to be considered and commissioned across London, with open access to all local areas and probation.

8. *Anything not covered?*

Further points are listed below :

Borough Commanders

The plan states that every borough will have a senior officer, currently a 'borough commander', however the figures quoted in the documentation do not give each borough access to a borough commander. This is a matter of concern. We would in no way support sharing a borough commander with another borough.

Boosting confidence in the police

The section on alleviating ASB appears to imply that ASB is only dealt with by the police and there is little or no reference to partner organisations who also have statutory responsibilities for this area of work. Nor is there any reference to the forthcoming changes in the legislation. MOPAC needs to review this section.

We are unclear on the meaning of the 'Safety Index', which appears to be a perceptual measurement tool.

Supporting victims and witnesses

This section again appears to be police specific with little acknowledgment that the crimes indicated often involve victims who would prefer to access policing and justice through other 'supportive' rather than criminal justice avenues. MOPAC should give further consideration to the wishes of the victim in regards to 'supportive access routes and interventions' prior to entering the criminal justice system.

The document states that 'robust' programmes will be put in place in regards to repeat victims in ASB, DV and hate crime. One size fits all will not be appropriate within this field across the number of 'victim types'. MOPAC should give further consideration to the wants of victims and how "low crime" boroughs also access these programmes whilst ensuring that these are not resource intensive for boroughs with limited such resource.

Cutting costs

This section states that the Commissioner will be held accountable for cutting costs and allocation of SNT's but there is no mention of holding him to account for quality of service and crime reduction. This seems to be a serious omission.

People

There is mention of NhW, BW and City Safe, however excellent programmes such as the street pastors are not mentioned. MOPAC should review the way in

which other local groups can improve the community delivery element of community safety.

### Boosting Volunteering

This covers a 25% increase in the cadet programme, but does not seem to recognise that some boroughs have exceedingly good cadet schemes with high numbers of recruits already. Further consideration should be given to the wider 'police family' and the volunteering opportunities and delivery that currently exist in this sector.

### Places

This appears to focus on the crime data that is already available, via the MPS. We wonder whether MOPAC intends to change the data, or data collection, in any way from that which is already delivered. MOPAC should give further consideration to the usage of partner data that would support the delivery of crime reduction and that is already available?

### Technology

Further consideration should be given to using existing resources such as local CCTV in the delivery of ANPR projects and how this could create a pan-London network of technological support.

### Prevention strategies

A pan-London approach is proposed in this document. Should pan London approaches be implemented, MOPAC should ensure that lower crime boroughs are not disproportionately disadvantaged by this approach and/or access to funding.

It is unclear as to what the expectation of partner organisations will be in regards to this. If not already undertaken, MOPAC should map the current prevention strategies across strategic organisations, within different domains, in order to ensure a holistic approach and understanding of this area of work?

### Partnership strategies

It is concerning that community safety partnerships and their strategic assessment of local needs do not appear in this section.

Due to lack of any real linkages between this document and community safety partnerships, MOPAC should clarify how it envisages these entities feeding into their work.

### Safer London for Women

The VAWG strategy does not support men who experience domestic or shame (honour) based violence. The needs of this underrepresented group should be addressed.

### ASB and Hate Crime

It is unclear as to what work is being considered pan-London in regards to the changes in ASB legislation.



It is also unclear as to what consideration has been given to boroughs where hate crime has always been statistically low/very low and how will the new minimum standards affect them and the partner organisations within them.

### Justice and resettlement

MOPAC needs to clarify what finance there will be to support the 'wrap around' services required in order to ensure effective resettlement, and whether this will be a local or pan London project.

Whilst PPO and IOM are mentioned in this document they are not factored into the new policing model. With the apparent reduction in staffing around this area of work MOPAC needs to ensure that these projects will not be adversely affected.

### Community payback

There appears to be little comment on the new provider of this service, Serco, and how they have had community payback and community linkages written into their contracts. MOPAC needs to set clear expectations on how Serco should work in conjunction with local partners and the community.

### Safer Neighbourhood Boards

We have concerns about the victims tasking, community payback, Serco's commitment to SNB, and the lack of information on what protocols and policies have been formulated to ensure that victims are not put at risk by, and have relevant support in, this process. A formal agreement is needed with Serco to ensure that this is deliverable locally, Linked to an assessment of Serco's knowledge base to support the undertaking of this work. Clarification is needed of the proposed 'monitoring victim complaints', as to whether this means complaints against the police, and if so how that fits with the police internal complaints processes?

### Estates strategy

Tooting police station is not in Merton, it is in Wandsworth and covered by their borough policing teams. Please amend these records.

Clarification is needed on the timeframes, cost implications and security issues in regards to PC's based outside of police stations (for example access to secure police data), and also on the budget for this and the proposed allocation policy for these resources.

## **Annex 3**

### **Custody Arrangements**

The London borough of Merton has concerns in regards to the movement of custody from Merton to Sutton. This has been trialled previously and was not a success. We believe that our communities will be seriously disadvantaged by this proposal.

Below (under the heading 'The Police') are the findings of the police 6 month review, of the movement of custody, as requested by the community safety partnership. In conjunction with these findings the process 'shunted' costs onto the local authority and in times of austerity this is not something that is sustainable.

### **The Council**

No consideration appears to have been given to the fact that the local authority has to deliver services in a different geographical area. This increases travelling time, and costs, as well as removing physical resource from delivering core services thus adding additional cost in order to cover both the needs at custody and on borough.

Services that are impacted to the greatest extent are:

- Children services
- Adult social care
- The YOT services
- The appropriate adults scheme
- Mental health services
- DiP delivery programmes

Service users disproportionately affected are:

- Young people
- Vulnerable adults – i.e. those with learning difficulties
- Clients with mental health needs
- Clients with drug and alcohol issues

No consideration appears to have been given to the structural and policy differences between geographical areas and the impact that changing custody to another area has, when the processes for geographical areas are not the same and therefore errors occur with the basic management of cases due to officers not knowing which policy to instigate.

Safeguarding is of paramount importance to us as a local authority and the movement of the custody suite away from borough seriously undermines the principles of safeguarding and appropriate service delivery.

### **The Police**

Below are the findings from the report submitted to the partnership in regards to the effectiveness of the movement of custody to Sutton from Merton. Whilst the report infers that this is positive, it is not seen that way by the partners. The

areas listed below are of concern to the partnership as a whole and we believe should be of considerable concern to the Metropolitan Police Service.

### **Deterioration in crime management**

Most importantly, Merton's sanctioned detection (SD) rates for this period seriously deteriorated. Whilst the combined figure appeared to show improvement, this was masked by Sutton's increased improvement on SD. This would show that Merton was adversely affected by this policy decision.

***Over a 6 month period Merton saw just under a 12% reduction in SD for KPI 1 (violence portfolio) and a near to 4% reduction SD in KPI 4 (property portfolio).***

This alone shows that Merton's community was disadvantaged disproportionately and the crime on borough was less effectively dealt with. This coupled with a reduced service to the borough and its community.

There was no significant improvement in or usage of cells. A target of 60% occupancy was set and only 36% was achieved.

A target of an 'increase of no more than 15% from arrest to arrival' was set. Merton suffered an 11% increase in time from arrest to arrival. We do not believe that it is appropriate that our communities should be disadvantaged by the original target. This figure also 'hides' the true times for this element of service at times of high demand and rush hour traffic, at which point Merton is considerably more disadvantaged than Sutton and other London boroughs.

The 'average time from point of arrest to last documented disposal' rose by 23 minutes for Merton offenders. This coupled with additional travelling time means that officers, who previously were on borough, were no longer available to undertake local duties.

In regards to improved standards of detainee care and upkeep of custody (as per HMIC guidance), this was considered to be RAG rated as red at the 2 month phase and was being reviewed at the end of the report. There has been no update to the partnership on this as yet. This means that the working environment was less safe for our officers and detainees than it was when retained here in Merton. This again gives specific concerns in regards to the vulnerable groupings listed above.

Damage to MPS reputation - prior to the review, Merton had 1 such complaint. The service received 4 and then 9 complaints (over each 2 month period) after the move to Sutton. This shows the deterioration in the perceptions of detainees that may be levied at Merton where the service has been perceived to be of a higher standard.

The 6 month review overtime costs (for CID and CSU) had increased from £22,138 to £27,331 this is roughly a 20% increase of overtime costs levied at Merton borough thus putting a strain on local resources and increasing costs.

Fuel costs also increased on borough by 62%, thus increasing cost to the borough even further.

## **In addition – issues**

The most worrying of these is that uniform officers spend a considerable time at Sutton booking in prisoners and writing up notes and if a 'call' comes in they are too far away to offer immediate or time appropriate response in borough. Whilst not in the report shared with the partnership, on two occasions there were no 'cars' available on borough as they were all at Sutton. This is not an acceptable situation.

Other issues were also identified by officers who were required to use the service such as there being limited office space and access to other jobs whilst waiting for custody processes to be completed, thus making our local officers less productive.

Supervision difficulties and difficulties in the collation of effective management information, split by borough, alongside increased waiting times for booking in prisoners are also of concern.

During this time it was noted that staff morale was negatively impacted, as was partner satisfaction, and whilst in the short term this did not show in perceptual rating, over a period of time it would.

## **In conclusion**

The transfer to Sutton disproportionately and negatively affected the borough of Merton by:

- Reducing SD on borough
- Increasing costs to the borough
- Reducing the productivity on borough
- Reducing service on borough
- Reducing positive working relationships with partners
- Reducing moral of staff
- Reducing the safety of our detainees
- Reducing the processes and understanding around safeguarding vulnerable people from Merton
- Increased costs for partner agencies

We believe that if this kind of deterioration of services, productivity and standards can be evidenced in a six month period then it would be considerably worse if this were to be turned into a permanent arrangement.

It should be noted that these issues have not been present since the return of custody to the borough of Merton.