

SAFER FUTURE COMMUNITIES

Empowering local voluntary & community partnerships

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Safer Future Communities

London Voluntary Community and Social Enterprise Network

Response to:

Mayor's Office for Policing and Crime

Draft Police and Crime Plan

March 2013

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Introduction to the London SFC VCSE network

The Safer Future Communities London Voluntary Community and Social Enterprise Network (London SFC VCSE network) welcomes the opportunity to respond to the Mayor's Draft Police and Crime Plan. This response represents the shared views of wider network and SFC steering group members on the strategy impacts for the voluntary and community sector (VCSE) and the outcomes they seek to achieve.

Safer Future Communities is a project run by Clinks, the national umbrella body for voluntary and community sector organisations with an interest in the criminal justice system and crime prevention. Nationally Safer Future Communities support the VCSE sector to engage with and influence Police and Crime Commissioners (PPC) and the new commissioning landscape in which they will operate.

The London SFC VCSE network is a network of over 400 voluntary and community sector organisations working in the field of community safety. It has been set up with the support of the Clinks' Safer Future Communities project to engage with and influence the Mayor's Office for Policing and Crime (MOPAC) in its role as the PCC for London. London Voluntary Services Council (LVSC) hosts the network.

The London SFC VCSE network has both a steering group and expert advisory group of leading voluntary and community sector organisations in the field of criminal justice working in London. The members of the steering group and expert advisory group have been co-opted in order to give a wide range of views of both small and large voluntary and community organisations and to gather the specific expertise on developing VCSE involvement with the criminal justice system.

London SFC VCSE network Steering Group members

Voluntary Action Lewisham
ROTA (Race on the Agenda)
BTEG - Black Training and Enterprise Group
GALOP
Merton Voluntary Services Council
Women's Resource Centre
Safer London Foundation
Victim Support London
Drugscope
Advance Advocacy Project
Clinks
Revolving Doors Agency
London Voluntary Service Council

London SFC VCSE network expert Advisory Group members

Age Concern UK
Missing People
Kiran Project
The Nehemiah Project
Waltham Forest Boxing Club
Voluntary Action Lewisham
Crimestoppers
St Giles Trust
Catch 22
3SC

This consultation response was developed using feedback from a number of events including

- 'Back to the Drawing Board' a joint LVSC and Civic Forum¹ Event on the 11th September 2012
- SFC Steering Group round table held November 2012
- SFC network launch on the 14th February 2013

¹ Between 2000 and 2012 London Civic Forum led civic participation in London by enabling and challenging London's governing agencies and institutions to use the valuable insight and experience of local communities. The Civic Forum was a member of the SFC Communities Steering Group until September 2012.

The SFC Steering Group welcomes the opportunity to respond to the Draft Police and Crime Plan. Overall the Steering Group was pleased to see:

- The promise to develop comprehensive prevention strategies such as the Violence against Women and Girls (WAVG) and Drug and Alcohol Strategies due this summer. London is unique and requires plans, strategies and policies that reflect its needs and address its specific complexities.
- The commitment to long-term funding of projects and services
- The implementation of light-touch commissioning.
- The development of a robust prevention evidence base through the suggested London Crime Prevention council.

However we have a number of concerns:

- The Police and Crime Plan timetable does not fit well with local commissioning cycles. We are also concerned to note that the final plan will be published in April 2013 after the start of the financial year, and it is unclear when the proposed annual action plans will be developed and subsequently implemented.
- The draft Police and Crime Plan currently represents the only opportunity for the VCSE sector and other stakeholders to influence the direction of pan-London policing and community safety issues over the next few years. We hope that MOPAC will pay close attention to the views of stakeholders from all sectors, provide feedback on consultation responses and give consideration to developing pan-London consultation and engagement structures to enable an informative, robust two-way relationship between MOPAC and the VCSE sector and other stakeholders.
- There are a number of actions in the Plan that mention equalities issues, for example the actions to increase the diversity of the Police force, the promise to have Lesbian, Bisexual, Gay and Transgender (LBGT) liaison officers in every borough in London and the acknowledgement of the discrepancy between Black and Minority Ethnic (BME) confidence in Police and that of the general population. However given the importance of equalities issues to London's communities the SFC Steering Group recommends that MOPAC proves its commitment to addressing equality issues by including, at the least, an Equalities Impact Assessment (EIA) of its final Plan and an action plan to mitigate any negative impacts identified.
- There is nothing in this plan that gives confidence that the Mayor understands the role of the VCSE sector or how it can support him and his officers in the delivery of crime and community safety interventions. The VCSE sector can act in a number of ways:
 - The VCSE sector can have a strategic role in addition to the current common role of being a delivery partner. Infrastructure VCSEs can act in a number of ways as co-producers, facilitators, brokers, partners and commissioners. At local, sub-regional and pan London level, the VCSE sector can act as a catalyst, bringing agencies together.
 - The sector has an important brokerage role, being independent, neutral and having a specific remit to support and give a voice to London's diverse communities.

- The VCSE sector leads on good community development practice and has a history of developing innovative approaches to crime reduction and community safety. MOPAC should be working more closely with the sector to enhance its research and development capacity, funding pilots and helping organisations to disseminate findings.
- The voice of service users, young people, ex-offenders and other vulnerable people is largely absent from the Plan. Working with the VCSE sector can make consultation processes more inclusive, as the sector has particular expertise in working with service users and in conveying their experience of services to statutory agencies.

PART ONE: THE MAYOR'S MISSION & PRIORITIES

This section of the Plan describes the Mayor's mission and priorities for policing and crime reduction in the capital over the next four years.

- The Safer Future Communities (SFC) Steering Group welcomes the Mayor's ambitious vision for London to be considered 'the greatest and safest big city in the world' and for the Metropolitan Police Service to become 'the UK's most effective, most efficient and even most loved Police force' (MOPAC pg. 6)² in the UK. However, it is vital that the Mayor, Deputy Mayor, MOPAC and wider GLA group understand that for some communities this vision is far removed from their lives. There is little in the plan that outlines specifically how the Mayor will evidence this vision to communities whose experience of the Police has been overwhelmingly negative.
- The SFC Steering Group is pleased to see some understanding of the importance of bringing together various agencies and the acknowledgement of the 'unique contribution' that communities can make (MOPAC pg.6). However we are disappointed that the Mayor has not mentioned the contribution of the VCSE sector either in his vision statement or in much detail within the draft Plan. Throughout this response the SFC Steering Group will suggest ways in which the VCSE's work could be better reflected within this document.
- The Mayor's crime priorities are derived from a number of commitments:
 - The Mayors crime reduction objectives- burglary, vandalism (criminal damage), theft from and theft of motor vehicles, violence with injury, robbery and theft from the person (MOPAC pg. 7)
 - Consultation with Londoners resulting in the following priorities- antisocial behaviour, gangs, stop and search, and the relationship between young people and the police (MOPAC pg. 7)
 - The Mayor's 2012 Manifesto commitments- which include developing smarter solutions to alcohol and drug crime, helping London's vulnerable young people, a renewed focus on street policing and giving victims a greater voice (MOPAC pg. 7)
 - The Mayor's special emphasis on 'additional public safety concerns' such as 'violence against women and girls' (VAWG), serious youth violence and business crime. (MOPAC pg. 7)

It is appropriate that the draft Police and Crime Plan is the document which brings together these various commitments and attempts to address them in a comprehensive way. However the SFC Steering group is concerned with the number of objectives that the Mayor plans to deliver, particularly at a time of reduced resources. We are worried that if MOPAC's capacity is stretched it is the objectives relating to crime prevention and offender treatment that might be disproportionately cut, when these are the activities that are most likely to have a long-term positive impact.

- Currently the plan suggests that all interventions will be delivered locally with minimal oversight by the Mayor. However it is clear that some interventions, for example gangs, drugs & alcohol and serious violence are better addressed at a pan-London level, as these are issues which do not respect borough boundaries. There is general agreement that other issues, such as antisocial behaviour, criminal damage and burglary are best addressed at a local or even neighbourhood level. The SFC Steering group would like to see more flexibility in the Mayor's approach. We recommend that specific consideration is given to the geographical level at which crime and

² Draft Police and Crime Plan 2013

community safety issues are best addressed within London, whether that be at a neighbourhood, borough, sub-regional or pan-London level.

- In addition, as part of the final plan the SFC Steering group would like to see the Mayor demonstrate a better evidence base that shows how his crime reduction priorities would affect different populations in London.
- The London Crime Reduction Board (LCRB) is a key body addressing crime reduction across London. It was formed in 2010 from the rationalisation of several pan-London Boards. Whilst its primary role is 'to hold statutory bodies to account on their performance in reducing crime and improving community safety within London'- it also has remit to 'establish good practice', 'understand need' and establish 'a consultative link to central government to influence crime strategy development'³. These are all areas that the VCSE sector has a great deal of expertise in, and we would hope that the Mayor, Deputy Mayor and officers will take action to more closely link the LCRB's work programme with the work of the VCSE sector.

PART TWO: OBJECTIVES AND GOALS WHAT WE WANT TO ACHIEVE

This section outlines the Mayor's objectives which are based on holding the Police to account, ensure that communities and the public work together to prevent crime, provide swift and sure justice for victims and re-offending and challenge the Police and other organisations to deliver value for money.

- Objectives such as the ones outlined in the draft Plan can provide a focus. However, in order to have confidence in the outlined targets, the London SFC VCSE Network would like to see a better explanation of how the targets were arrived at including the evidence base used and consultation process.
- In common with other organisations in the public sector, MOPAC has been through a number of changes since the 2010 Comprehensive Spending Review. The London SFC VCSE Network welcomes the explanation of MOPAC's role in leading on 'policy development, performance scrutiny, budget setting and monitoring' (MOPAC pg. 8). However it is unclear how these tasks will be accomplished and how they will fit into the work of the GLA Group: for example how will MOPAC's performance scrutiny role link with the London Assembly's Police and Crime Committee's work, and the Metropolitan Police Service's own performance management function?
- The mention of performance measures that focus on 'results not process or activity' (MOPAC pg. 8) is positive. However, developing community safety interventions is complex and can be process heavy, for example creating criminal justice pathways to make sure that offenders are effectively transferred from one agency to another, creating information sharing protocols, developing databases to capture performance information etc. The London SFC VCSE Network hopes that performance measures will include support to develop the infrastructure that supports measurement of their delivery, so not reducing VCSE organisations' capacity to deliver frontline services.

³ Information on the London Crime Reduction Board- <http://www.london.gov.uk/priorities/policing-and-crime/lcrb>

PART THREE: POLICING IN LONDON

The Mayor's key role is the oversight of the MPS. His main aim is to reform neighbourhood policing and keeping police numbers high. The Local Policing Model is key to improving visibility and making sure the police are out fighting crime and not behind desks completing paperwork.

- Despite having very different organisational cultures and working practices the MPS and VSCE have a rich tradition of partnership working. The MPS has successfully worked with VCSE organisations, at a regional, local and neighbourhood level, including funding interventions and through organisations such as the Safer London Foundation⁴. Yet, the draft Police and Crime Plan seems to overlook the contribution that the VCSE has made in keeping London safe.
- Britain's policing tradition is policing by consent. The Safer Neighbourhood Teams (SNTs) have been at the forefront of working with communities to reduce crime and the fear of crime at a local level. The London SFC VCSE Network is concerned that the proposed changes to the SNTs might undermine their relationship with their local communities. Stability and continuity of neighbourhood police officers allows them to get to know the community and people they serve and allows them to be known and liked by local people, which engenders mutual respect and trust.
- The London SFC VCSE Network is pleased to see the commitment to maintaining Community Safety Units (CSUs), and Safer School Officers and a Borough Commander in each borough. The Borough Commander provides a focus for leadership at a local level, Safer School officers have a good tradition of working with voluntary and community sector organisations to support young people at risk of, and involved in, crime⁵ and a number of CSUs are developing best practice in supporting vulnerable victims of crime. The London SFC VCSE Network plans to support local VCSE organisations to work with their policing structures ensuring that good practice is replicated across London.
- The MPS plans to move emergency response and patrols, investigation teams, uniformed borough tasking teams and grip and pace centres to neighbourhood policing. Whilst the London SFC VCSE Network supports activities that will improve detection rates and police effectiveness, these must be shown to be effective and not negatively impact on community relations. We would urge that all officers who are likely to come into contact with vulnerable communities or those at risk of discrimination are trained to work with diverse groups and liaise with the local voluntary and community sector who can help to broker relations either directly, or through bodies such as Independent Advisory Groups (IAGs).

⁴ The Safer London Foundation is the MPS official charity that works with London's local communities and young people to reduce crime and improve community safety.

PART FOUR: STRATEGIES - HOW THIS WILL BE DELIVERED

The objectives will be delivered across three pillars, reflecting the three core elements of the Police and Crime Plan. These are police performance and resources, crime prevention and justice and resettlement

Cutting Neighbourhood Crime by 20%

- The emphasis on victim-based offences is welcome, as is the acknowledgement that increases in some crime types such as possession of offensive weapons and drug offences are a reflection of police activity rather than actual incidence. However, the plan should recognise that some deprived areas are under-policed. The London SFC VCSE network suggests that in those localities drug offences etc., can act as a proxy measures to earmark these areas for more effective policing. Further, as Drugscope notes, drug markets, particularly open drug markets, can have a notable effect on residents' feelings of safety: therefore, in such areas this should be a priority ⁶.
- The draft Police and Crime Plan acknowledges the low reporting rates of hate crime, domestic violence, rape and other serious sexual assault, and promises that reporting rates will be actively monitored (MOPAC pg 16). This section of the Plan needs more detail and a better explanation on how under-reporting will be addressed.
- The London SFC VCSE network welcomes the commitment for the Police to produce high quality accurate information, and to publish and disseminate the data through the London Data Store. Thought should also be given to ensuring that crime and community safety data from all statutory agencies across London can be shared with the VCSE sector and the general public. Organisations within the VCSE may also wish to share their data, and they should be supported (not compelled) to do so.

Counter-terrorism

- The draft Plan has not acknowledged the significance of the contribution of the VCSE sector, in particular faith communities, to preventing terrorism. This is disappointing as the Home Office⁷ has acknowledged the importance of partnership work, including the role of the VCSE sector, in preventing terrorism. We recommend that the final plan references the role of community and faith groups and outlines how the Mayor plans to engage relevant communities in the future.

Maintaining Public Order

- The reactions to the 2011 London disturbances were a good example of partnership working where the VCSE sector, particularly the youth sector, were instrumental in preventing further escalations of violence, as well as promoting community cohesion afterwards. This effective partnership work was predicated on having a stable, locally focussed police force who knew how to work with the right

⁶ MOPAC consultation on draft Police and Crime Plan 2013-17 Response from DrugScope/London Drug and Alcohol Network (LDAN) March 2013

⁷ The 2011 Prevent Strategy seeks to work with 'work with wide range of sectors where there are risks of radicalisation which we need to address, including education, criminal justice, faith, charities, the internet and health'

organisations. This form of partnership working should be specifically referred to as a key factor in ensuring the maintenance of public order with the final Police & Crime Plan.

CONFRONTING GANGS

The London SFC VCSE network submitted a response to the London draft Anti-Gangs Strategy in October 2012. Some of the issues that we highlighted included:

- welcoming the use of a partnership approach to tackle the multifaceted issues of gangs, but with more explicit recognition of the role that the VSCE sector can play.
- acknowledgement of the role that information sharing has to play in addressing gang-related activity, whilst ensuring that such sharing does not detrimentally impact the relationship between VSCE sector providers and their clients.
- that enforcement activities should be transparently monitored to ensure that their use is justifiable to the community, particularly BME groups who tend to be overrepresented in the criminal justice system.
- a recommendation to consider assessing the provision of gender-based services across London to identify and fill gaps in services provision for women and girls. Race on the Agenda's (ROTA) research and work with girl gang members has found that, young women involved in gangs can be very vulnerable and their needs should be treated as a safeguarding rather than an enforcement issue.⁸

Boosting Confidence by 20%

- Whilst the London SFC VCSE network is pleased to see the inclusion of perception measures within the draft Strategy, the fear of crime is based on people own experience not on objective fact. Perception outcomes are generally measured by surveys, such as the 'Place survey' but BME, newly arrived communities and other such deprived groups are less likely to respond to these methods. The network recommends that special provision is made, through local VCSE organisations to ensure that the voice of these less easily heard communities is more widely researched.
- The draft Plan rightly acknowledges that there are unacceptably low levels of confidence in the Police amongst Black Minority Ethnic (BME) groups. The London SFC VCSE network welcomes this emphasis and plans to address it, but wants to see more action to include younger BME people and emerging populations, such as the growing Eastern European population and refugee and asylum-seeking groups. Many of these latter communities have extremely negative perceptions of the police based on their experiences in their home countries.

⁸ BTEG response to the draft Police and Crime Plan March 2013

- The mention of social media is welcome. Twitter, Facebook and other applications have proved popular with young people, in particular. However, the MPS should be aware that a number of groups such as older people do not have access to the internet or smart phones and the small but significant proportion of the population who are illiterate, have similar problems in engaging with these forms of communication, unless suitably adapted to their needs.
- There is a need to support the development of consultation frameworks to support pan-London forums on certain issues. For example, LGBT, women and girls, gangs and serious youth violence, hate crime are all issues where it is essential that London-wide strategies inform local provision. The VCSE sector can support the MOPAC to identify these service provision gaps. Several groups have highlighted a lack of confidence, not just in policing overall, but also in specific units, relating to these specific areas.⁹
- There is a statutory duty for MOPAC to engage with the local community, and other stakeholders when developing plans and strategies. More detail is needed on how this duty will be discharged, and more importantly how the voice of more marginalised members of the community will continue to be sought and included.

Improving public access

- The London SFC VCSE network is pleased to note the acknowledgement that deprived communities may need face-to-face access at stations, 'particularly where there are language barriers' (MOPAC pg. 17). However, the plan to close down police stations, reducing counter hours in order to save money does not link well with this objective. The network hopes that the MPS take a strategic view, ensuring that counter services are available in the most deprived areas of the community and that information and translation services are available in a range of community languages.
- The Plan mentions actions to open police centres in accessible venues such as council buildings, libraries and post offices. VCSE sector premises and community centres could also be used, as more marginalised communities are more likely to access police services in areas where they are familiar. Through the development of third party reporting services a number of VCSE sector organisations have acquired expertise in taking police reports and ensuring they are passed on to the appropriate authority.
- Third party reporting sites have had a mixed record. Some BME groups feel that they have not been successful and do not support the expansion of these schemes.¹⁰ Other groups support third party reporting and have found it particularly successful within their communities, but state that they need to be adequately resourced.
 - In order to function effectively third party reporting sites need resources for publicity, training and monitoring. It is currently unclear how MOPAC will support organisations to run third party (or

⁹ For example, the crisis in confidence in the Sapphire Unit as highlighted in the End Violence Against Women's Coalition response to this consultation

¹⁰ BTEG Race Equality consultation events on 20th and 27th February 2013

assisted reporting) sites.

- Research by GALOP shows that LGBT groups, in particular, respond to pan-London reporting sites, as they are less likely to be comfortable accessing local initiatives.¹¹
- It should be recognised that third party reporting sites do more than pass over reports to the police, they also provide support to victims¹²
- There are a number of examples of good practice of third sector reporting across London: MOPAC should consider working with the VSCE sector to ensure these examples are collected, and best practice is replicated across the capital, particularly in the areas of highest need.

Supporting Victims and Witnesses

- The London SFC VCSE network notes the Mayor's new responsibilities to commission victim support services from 2014/15. Victim issues in London are complex with a number of VCSE sector organisations providing both generic and specialist services.

2013/14 is an opportunity for the Mayor to work with victim services to develop the most appropriate services, based on the proposed comprehensive analysis of victim's needs. The London SFC VCSE network recommends that VCSE organisations and specialist victim support services will be fully involved in the process of victim support service development: from the creation of the needs analysis to the commissioning of services. To ensure trust and confidence in the system, this process needs to be transparent and accessible to all.

- The focus on repeat victimisation is welcome, as it is often the most vulnerable members of society such as people living in deprived areas, disabled people, women and girls and homeless people who are at most risk. The MPS should work with organisations which support these groups to ensure that the interventions developed effectively address identified needs. There are a number of examples of good practice e.g. work undertaken by some councils to protect properties occupied by people with learning disabilities.
- The plan overlooks some of the complexities of victims' experience. Vulnerable people can sometimes be both perpetrators and victims of crime; however their needs as victims are overlooked and research shows that vulnerable victims of crime are more negatively impacted by victimisation than mainstream groups¹³. The London SFC VCSE network recommends that the newly commissioned victim services, and police actions to support victims, will be fully accessible to all vulnerable people even those who may be involved in criminality or anti-social behaviour, although thought obviously needs to be given to ensure perpetrators are not allowed contact with their victims.

¹¹ 'Filling the Blanks' - GALOP 2008

¹² 'Filling the Blanks' - GALOP 2008

¹³ American research shows that amongst other factors - a lack of or poor social support systems can increase the likelihood of victims to develop mental health problems - National Victim Assistance Academy 2007

- The actions to support witnesses are welcome. Witnesses can need as much support as victims, particularly those from newly arrived communities who may not be as familiar with the British justice system, or might have had negative experiences with the police in the past.
- Victim and witness support services should be commissioned at both a local and pan-London level. For reasons of confidentiality some victims and witness may not feel comfortable in accessing support services in their local areas. For some crime types regional or sub-regional commissioning can be more effective. For example the rape crisis services, by being sub-regional allow a greater possibility of anonymity, and security, for the victim and a concentration of expertise in dealing with this crime.

Stop and Search

- Stop and search is a major concern for a number of groups including members of the BME community and young people. The recent experience of Stephen Lawrence's brother shows that this continues to be a live issue, despite the monitoring role of local stop and search groups. MOPAC and the MPS need to demonstrate how they are going to change and improve practice to address the concerns of BME and other groups.
- We are hopeful that the plans to pilot new ways of dealing with Stop and Search in Lewisham will bring to light good practice that can be replicated across London.
- Police officers need training in experiential communication so that they can successfully engage with young people. Personal relationships are very important and too many police officers need to work on their interpersonal skills in community situations, including listening. However, we are happy to report that some network members felt that some police officers in London are great communicators and have a tremendous positive impact through their interactions.
- The Black Training and Enterprise Group (BTEG) ran two consultation events to enable BME groups to respond to issues raised in the draft Police and Crime Plan. They made a number of recommendations regarding stop and search, such as suggesting that young people should be given better training on 'Stop and Search', MPS should publish better outcome data and the work of frontline police officers should be monitored more effectively to ensure that they meet practice standards¹⁴. The London SFC VCSE network's response supports these recommendations.

Deaths in Custody

- Actions to addressing deaths in custody are worryingly underdeveloped, and the draft Plan seems to underestimate the impact that deaths in custody and other deaths caused by the police have on

¹⁴ BTEG Race Equality consultation events on 20th and 27th February 2013

communities, particularly if these involve minority communities, who are already the victims of discrimination. Relying on the Independent Custody Visitors Programme, as suggested in the draft Plan, to address these issues is inadequate.

- At the very least the London SFC VCSE network would like to see a robust comprehensive pan-London 'death in custody' strategy overseen by a high level steering group where a variety of BME and VCSE sector organisations are represented. Actions taken need to be reported widely to ensure that the public can be confident that this issue is being taken seriously.

Building a Police force that looks like the city that it serves

The London SFC VCSE network welcomes the proposals to improve the diversity of the MPS through increasing the number of BME members of the force. In addition the SFC would like to see:

- A police force which truly reflects London's diversity including newly arrived communities, the LGBT community, women, disabled people and other groups as mentioned as part of the 2010 Equalities Act.
- That the actions to support and encourage these groups to progress at all levels of their careers are robust, monitored effectively and transparent.
- We hope that the Mayor will recognise the potential of staff within the voluntary and community sector and that any opportunities to join the police force at a senior level will be open to candidates from the VCSE sector, as well as people working in the private and public sectors.

CRIME PREVENTION

The draft Police and Crime Plan states that there are a multitude of engagement activities between MOPAC and Londoners as well as between the police and Londoners. This section of the draft Plan states that it aims to make them become more comprehensive, less fragmented and more effective.

Empowering people to support the police

The MPS's interventions need to address the fact that for a number of communities, the VCSE sector is seen as independent and is trusted by people in a way that, however good they are, statutory agencies are not. The VCSE sector can, therefore, reach people whose voice would not otherwise be heard.

The draft Plan states that in line with the Mayor's manifesto commitments Safer Neighbourhood Boards (SNBs) will be replacing Community and Police Engagement Groups (CPEGs) as the primary borough-level consultative forum, the London SFC VCSE network has considerable concerns about this proposal:

- Safer Neighbourhood Boards appear to be a mechanism for performance management and addressing complaints about the police, rather than one for engagement. They do not mention engaging more vulnerable members of the community and there are no other mechanisms for such local engagement.
- The proscriptive nature of the proposed SNB membership. We would recommend a combination of static and flexible representatives supported by a wider network. Some groups within communities are notoriously difficult to engage.

- In order to be effective the SNBs need to be based in neutral organisations like the local Councils for Voluntary Service. The SFC would also suggest that MOPAC support capacity building projects to enable more varied representation in these local engagement structures.
- The VCSE sector should have representation on the local SNBs in order to raise the concerns of more marginalised groups, as they are more likely to have an understanding of the needs of the most vulnerable members of the community.
- According to this model victims will have a role in holding their local police force to account. The proposed role of victims is problematic. It would be difficult and potentially unethical to place this burden on victims. They may not want to be identified. Equally hidden victims, such as those suffering domestic violence might receive services outside of their boroughs due to no local provision, and therefore their needs might not be represented at a local level.
- The current CPEG structure, despite their remit to enable the engagement of all members of the community in policing and related initiatives has had at best a mixed record of helping the VCSE sector and the people it supports to engage with the police. There are examples of good practice, for example where Merton CVS and statutory community safety organisations work in close partnership. However this good practice is the exception to the rule and more often than not it is 'the usual suspects' who are represented on engagement structures.
- There is a question regarding how the work of CPEGs can be replicated in the Safer Neighbourhood Boards, particularly given the reduction in funding. CPEGs have seen their funding reduce by more than 40% year on year. Most CPEGs will be required to deliver their work programmes on a budget which has fallen from approximately £50 000 in 2010/11 to approximately £25 000. It is unclear how SNBs will be funded in the future.

PLACES

Tackling crime hotspots

- The plan will work on crime mapping to enable the identification of where crime is occurring. The London SFC VCSE network recommends that local police teams will be encouraged to proactively seek local intelligence from community members. It is often the more marginalised groups for example young people, who are aware of where the unreported crime is occurring and who is responsible.

PROBLEMS

Developing prevention strategies

The London SFC VCSE network is pleased to see the commitment to develop 'evidence-led' 'outcome focussed' prevention strategies based on 'data from a range of sources' and 'community and stakeholder consultation' (MOPAC pg. 23). However this draft Police and Crime Plan has been developed without a clear evidence base, an Equalities Impact Assessment or comprehensive consultation with stakeholders. The network recommends that prevention strategies will be developed more transparently, based on a robust evidence base, and in genuine partnership with a range of stakeholders.

Alcohol and Drugs Strategies

- The London SFC VCSE network is happy to support the development of London drugs and alcohol prevention strategies, and recommends that these will reflect the best practice, and evidence base acquired during the years of delivering the national Drug and Alcohol strategies.
- With the end of the Greater London Drug and Alcohol Alliance (GLADA), the National Treatment Agency and the Government Office for London, it is not clear who will be responsible for pan-London oversight and delivery on this agenda in the future.
- Strategies will need to be comprehensive with interventions across prevention, reduction and treatment, and have good links to public health and local Health and Wellbeing boards, as well as the London Health Improvement Board.

A safer London for women

- Organisations working in the women and girls sector were pleased to see the continued commitment to and funding for violence against women and girls (VAWG) interventions. The London SFCVCSE network recommends that the Mayor mandate local structures such as Crime and Disorder Partnerships (CDRPs) to continue ring-fence funding for women's services.
- The London SFC VCSE network is pleased to see the attention to reducing harmful practices such as female genital mutilation, honour-based violence and forced marriage included in the draft Plan. This can be extremely sensitive areas of work and it is important that community led organisations with expertise in this area continue to be supported to provide much needed specialist services.

- The London SFC VCSE network looks forward to the opportunity to contribute to the forthcoming VAWG strategy. MOPAC has the perfect opportunity to work with local boroughs to promote the VAWG approach as some boroughs are only focussed on domestic violence and do not wish to address specific issues linked to VAWG such as rape, sexual violence, sexual harassment, female genital mutilation, forced marriage, crimes in the name of honour, trafficking and sexual exploitation. We recommend that the Mayor and Deputy Mayor use their influence to ensure that these issues are addressed locally. There is little point in identifying pan-London priorities, if the localism agenda is used as a barrier to co-operatively addressing them.
- The London SFC VCSE network supports the Mayor's continued acknowledgement that women and girls are disproportionately affected by violence and abuse and recommends that specialist services for women affected by this continue to be provided across London. Our members report that some commissioners have asked VAWG services to provide services for male clients in addition to the services that they provide to women. In the majority of cases this is entirely inappropriate and raises the danger of women failing to report this crime, resulting in long-term abuse that creates much higher economic and social costs. The judicial review involving Southall Black Sisters and Ealing Council also demonstrates how such inappropriate commissioning can breach the law, leading to more waste on costly court cases.
- The London SFC VCSE network is, however, acutely aware that men and boys can also be victims of domestic violence, prostitution and other needs addressed by VAWG strategies, and that there are specific issues for transgender, bisexual and gay men. In a region, that has the highest incidence of such need it is important that the Mayor provides appropriate services to address these. We recommend that MOPAC works with agencies such as GALOP that can produce clear evidence of providing services that meet the needs of some of the most excluded communities and do not take a 'one size fits all' approach, however, economical it may seem in the short term.
- GALOP themselves point out that VAWG interventions should recognise that women can have differing gender histories and sexualities. Their experience is specific and provision should accommodate their needs¹⁵

Hate crime

- The mention of hate crime and its pernicious effect in the draft Plan is welcome. However, the sector would like see the Mayor outline more specifically what robust action he will be taking to prevent, reduce and support the victims of hate crime. The former Metropolitan Policing Authority (MPA) had a programme to scrutinise local CDRPs and challenge them on their response to hate crime. This was successful in improving the performance of the MPS and enabled the sharing of best practice. We expect that the Mayor will take similar action to address this crime as part of this plan.
- Actions to address hate crime should take into account the differing experience of those affected and issues of intersectionality. For example, a Black disabled person might experience race hate crime in a very different way to a Black person who is not disabled. Interventions should be able to

¹⁵ GALOP - Policing & Crime Plan 2013-17 Consultation response March 2013

address a range of needs, and allow the victim to identify themselves in the way they find most comfortable.

JUSTICE AND RESETTLEMENT

The London SFC VCSE network recommends that the Mayor's new role in 'contributing to the efficiency and effectiveness of London's criminal justice system' (MOPAC pg 27) will result in a system that takes into account London's uniqueness and complexity and is able to meet London's needs.

The current 20:20:20 target proposals are troubling, as it is unclear on what evidence basis they were set, and the sector is concerned that commissioned organisations will be expected to deliver against targets which may be overly optimistic at a time of reduced financial resources and worsening social conditions.

REFORM

Seeking swift and sure justice for victims

- The London SFC VCSE network questions the aim of 'swift justice' (MOPAC pg 27). The plan should acknowledge the complexity of the justice system, where speed is not always possible. Sentencing needs to reflect the individual needs of each offender. The complexity of issues facing most offenders, including the difficulty of integrating work across the agencies supposed to support them, means that we are not in an easy 'one-size-fits-all' situation.
- Better explanation is needed of some of the terms used in this section, in order to provide productive comments and suggestions for improvement – for example, what is meant by 'an ineffective trial' (MOPAC pg 27)? Without such a definition, the expert groups we consult with are unable to effectively contribute to this response.

Payment by Results and Social Impact Bonds

- The London SFC VCSE network is aware that MOPAC, like other public sector organisations are being asked to make significant cuts in their spending. In this context it is understandable that 'smarter commissioning' is one of the key objectives in the plan. However, the network suggests that lessons can certainly be learned from some of the failures already demonstrated by the commissioning of the Work Programme in London. The network recommends that MOPAC considers the introduction of Payment by Results (PbR) and other new commissioning interventions carefully. Reports from those involved in the Work Programme have suggested that some aspects of the Work 1 Programme have been open to manipulation by the more unscrupulous providers, resulting in those most in need of support being excluded or 'parked' and the expert organisations that supported the most disadvantaged having to close because of cash flow problems.
- Bringing in new providers, even those from the private sector is welcome, if they can be shown to provide the best services for their users, but questions remain regarding how providers are currently recording and sharing results, and how best practice is being communicated. Most specifically, present commissioning systems seem to favour larger providers. The final Plan should include measures that specifically support small specialist providers, whose evidenced success in working with those who are most disadvantaged also benefits the London economy and provides a wider social and environmental benefit. It is only by providing specialist services that fit the needs of the most disadvantaged Londoners, that MOPAC can make a long-term difference, with the concomitant economic savings. And it is only by considering the wider social determinants that impact on crime and anti-social behaviour that MOPAC can contribute to the success of other Mayoral strategies such as London's economic development.

- The draft Police and Crime Plan does not seem to acknowledge how complex working with offenders can be, and how difficult it can be for offenders to progress. Just because it takes a long time for offenders to move on, it does not mean that progress is not being made. The lessons from the Work Programme show that commissioners need to be flexible in how they measure outcomes, and need to invest in more research to identify more cheaply measured outcome indicators.
- Action is needed to stop providers 'cherry-picking' offenders to work with. LVSC's own research and the Public Accounts Committee's recent investigation both suggest that this is particularly a problem with larger private sector providers, who have a duty to produce profits for their shareholders. It would be useful to get some clarity on how the Mayor and MOPAC will hold service providers/contractors to account in the delivery of their programmes. The London SFC VCSE network has written a response to the Ministry of Justice's 'Transforming Rehabilitation' consultation outlining our concerns on this issue in more detail, which are attached to this response.

Working with the Government to reform the justice system

Whilst the London SFC VCSE network supports the aim of making the criminal justice system more efficient, we recommend that the Mayor specifically considers that a number of groups have been shown to have received less favourable treatment by courts. BME groups receive higher sentences for the same offences than the general population which leads to their overrepresentation within the prison population¹⁶. The re-offending rate of BME groups is of particular concern. BTEG figures place the re-offending rates of BME groups as higher than those of the general population¹⁷. Furthermore the Women's Resource Centre point out that women's offending is often linked to their experiences as victims of crime. When added to their role as carers often being overlooked during sentencing, we have a system that destroys families and is ineffective in addressing the causes of crime. It is disappointing that none of these issues is effectively raised or addressed within the draft Plan. We recommend that these serious omissions are corrected in the final Plan..

The mention of Integrated Offender Management (IOM) schemes is welcome as they ensure that offenders are supported across the whole criminal justice pathway. Most local IOM schemes are overseen by a local steering group, some of which include local VCSE sector representation. All IOMs should be encouraged to engage with the VCSE sector at both a strategic and delivery level, with VCSE representation on their Steering Groups as a minimum requirement, to ensure that they involve and engage the most disadvantaged communities in their borough..

REPARATION

- The London SFC VCSE network questions whether the examples of substance misuse interventions proposed by the Mayor really reflect the needs that exist in London given the

¹⁶ In 2010, the highest average custodial sentence length (ACSL) for those given determinate sentences for indictable offences was recorded for the Black ethnic group, at 20.8 months, followed by the Asian and Other groups with averages of 19.9 months and 19.7 months respectively. The lowest ACSL was recorded for the White group at 14.9 months- Statistics on Race and the Criminal Justice System Ministry of Justice 2010.

¹⁷ BTEG – 'According to government figures in 2009 show the reoffending rate for black people was 27% just ahead of the rate White people' from BTEG CONFERENCE On Employment, Education, Enterprise And Rehabilitation Supporting BAME Offenders To Change Their Lives 20 June 2012.

differences between the UK and the USA in terms of substances being used, offender profiles and criminal justice systems. The Mayor should work with London-based providers to develop interventions which reflect the needs of offenders within this city and ensure that there is a strong evidence-base for the effectiveness of these interventions in pilot projects in London, before advocating their use.

- Abstinence-based solutions do not always address the offenders' underlying needs: the evidence base clearly shows that one size does not fit all when it comes to recovery. Developing effective substance misuse interventions is about recognising and meeting individual needs. Providers should be able to offer a menu of support options ranging from harm reduction to abstinence based services to work effectively with substance misusers and substance misusing offenders. The final Plan should provide clear evidence, which relates to the specific needs of Londoners, for the substance misuse measures that it will fund. Reflecting the evidence, and the huge diversity of London's population, this should include and promote both harm reduction and abstinence-based services.
- Substance misuse is a relapsing condition. The average substance misuser is likely to relapse a number of times before finally becoming clean, and drugs users can take up to six months to become completely drug free.¹⁸ Punishing drug and alcohol users for what is a natural part of the recovery cycle can push people further into criminality and away from support services. The final Plan should specifically consider relapse and provide guidance based on the evidence from successful recovery programmes in London to address this issue.

Getting more from existing sentencing option

- The draft Police and Crime Plan makes no mention of restorative justice interventions, even though they are a form of reparation, they are popular with victims and there is considerable evidence that they are effective at reducing reoffending rates.
- The 'Reparation' section similarly does not make any mention of the Ministry of Justice's 'Transforming Rehabilitation' proposals, which will come into place during the life of the final Plan. The final version of the Plan should outline how MOPAC intends to amalgamate the suggested changes. MOPAC should also analyse the impact of these proposals in London and develop an action plan to mitigate against any unintended negative consequences.

Ensuring the sentencing decisions fits the crime

- There are some interventions in this section which are welcome. For example, the commitment that sentencing will be based on robust information, as well as actions to improve partners, as well as the public's understanding of the criminal justice system. However, there are already a number of actors involved in the criminal justice system who have clearly defined roles on this issue, so it is unclear how the suggested MOPAC intervention will add value. The London SFC VCSE network supports Revolving Door Agency's recommendation that the best role for MOPAC would be to 'use its engagement structure to explain sentencing to the public'¹⁹. This relies on MOPAC developing a robust, accountable and transparent public engagement system, which we recommend is more clearly focussed on in the final Plan..

¹⁸ Drug treatment in England: the road to recovery NTA 2010

¹⁹ Revolving Doors Agency response to MOPAC's Police and Crime Plan consultation March 2013 pg. 12

The criminal justice system must balance the rights of victims, the principles of justice and fair treatment of offenders; the plan's proposed interventions around sentencing do not take this complexity into account.

- The London SFC VCSE network notes with concern MOPAC's proposed role 'in monitoring the length of sentences to ensure that they are not too lenient' (MOPAC pg. 32) and is concerned that this is not balanced by an equally important role in monitoring sentences to ensure that they are not unduly harsh. A number of VCSE sector organisations have been campaigning for the increased use of community sentences through organisations such as Making Justice Work²⁰. We recommend that similar bodies are involved in the review of sentences to ensure that they are fair to all stakeholders, including the offender.

REHABILITATION

- The London SFC VCSE network agrees with the aim of 'empowering ... local areas to provide effective responses' to reoffending (MOPAC pg. 32) and recommend that the VCSE sector is included in the processes, governance arrangements, structures to oversee local interventions. The VCSE sector has a great deal of expertise, particularly in working with the most disadvantaged and excluded, whose circumstances increase their risk of entering the criminal justice system.
- Project Oracle ²¹, which focuses on youth justice, has been a mixed success. Some of the evaluation methods it proposes are not suitable for organisations in the VCSE sector, and while the guidance from Project Oracle acknowledges this, some commissioners have not understood this. The London SFC VCSE network would like to see a better acknowledgement that VCSE organisations can and do evaluate their own interventions and should be encouraged to develop evaluation systems which best suit them. Commissioners need to be more flexible on their monitoring requirements, as there is already a huge amount of evidence that can suggest less onerous, and cheaper to measure, outcome indicators that indicate long-term impacts. For example, the Department of Health's work on alcohol screening and brief intervention suggests, that as long as there are checks on the quality of delivery, the depth of evidence is now sufficient for output monitoring alone to be used to evidence long-term impacts.
- The London SFC VCSE network welcomes the introduction of the London Prevention Council. We recommend the Mayor considers the inclusion of the VCSE sector within its structures, as a number of organisations have the knowledge and capacity to provide unique contributions to the Council, which could only improve its work. The inclusion of VCSE organisations would also provide the London Prevention Council with more credibility within the sector, which is important at a time when spending cuts make the long-term efficiencies of cross-sector working more important than ever. .
- Although we are pleased to see the mention of a number of interventions such as mentoring within this section, some of the key interventions, with significant evidence of success have been left out, including restorative justice interventions and advocacy services. We recommend that these are included in the final Plan.

²⁰ <http://www.makejusticework.org.uk/>

²¹ Project Oracle is London's youth evidence hub. The programme seeks to understand and share what really works in improving the lives of children and young people <http://www.project-oracle.com/>

- The draft Plan does not recognize the complexity of offenders' needs: research shows that offenders have a range of support needs²² The London SFC VCSE network supports Revolving Door Agency's recommendation of a pan-London strategy for tackling repeat offending by people with multiple and complex needs in the final Police and Crime Plan²³
- The draft Plan does not recognise that offenders cannot be compelled to obey some of the schemes it suggests. This is a particular issue for those accessing the non-statutory services run by the VCSE sector. Often charity sector organisations working in this field have been set up to support offenders or ex-offenders: in these cases they would be in breach of Charity Law if they were to be asked to enforce conditions that were not in their clients' best interests. The VCSE sector should not be forced to become too coercive, as it will then quickly lose its distinctive benefits, which usually produce more successful outcomes with the most disadvantaged individuals, compared with services delivered by the private or public sector..

MOPAC Draft Commissioning Principles

- The VSCE sector is particularly pleased to see the emphasis on developing long-term commissioning plans which should give stability to organisations and enable them to plan for their future.
- The London SFC VCSE network is also pleased to see the commitment to pooled budgets which should improve strategic coordination and reduce silo-working.
- We welcome the emphasis on 'light-touch commissioning'. However, we note that a good commissioner should work in partnership with providers and help them to improve their services. Commissioners should be more than merely contract managers and this should also be more strongly reflected in the final Plan
- The network is concerned that payment by results (PbR) will be seen as a solution to addressing any performance issues within the VCSE and other sectors. The implementation of PbR has been more problematic than commissioners have been prepared to admit and PbR frameworks do not take into account the difficulties of working with offenders, as demonstrated by the Peterborough prison social impact bond pilot.
- The draft Plan's aim of basing commissioning decisions on match funding is not straightforward. The VCSE sector can bring a lot of free resource from their external funders to the table but the police/MOPAC should still expect to provide funding to the sector and not take community resources for granted. Charity donors often specifically state that they do not want their donations to be used to subsidise public service delivery, and many trust funders will not subsidise services that the state has a statutory duty to provide. We recommend that more work is conducted around Charity legislation, and with other funders, to ensure this part of the Plan can be effectively implemented across the private, public and civil society funders.
- Drugscope notes that from 2014 the ring-fencing of community safety funds will be removed, and the whole Mayor's budget can be spent on Policing. The London SFC VCSE network supports their

²² Ministry of Justice figures estimate that 90% of prisoners estimated to have some form of mental illness and that 69% of prisoners had used illicit drugs in the year before custody (MoJ 2008)

²³ Revolving Doors Agency response to MOPAC's Police and Crime Plan consultation March 2013.

recommendation that given the even greater complexity of issues in London, and the proven cost effectiveness of treatment initiatives, the Mayor commits to providing an equivalent inflation-adjusted community safety budget for prevention and treatment initiatives in the final Plan .²⁴

London Safer Future Communities VCSE Network

LVSC is working with Clinks to build, lead and manage a network of London voluntary, community and social enterprise sector (VCSE) organisations with an interest in criminal justice and community safety issues. The network provides an accountable way for London's VCSE to engage with the new Mayor's Office for Policing and Crime (MOPAC), other pan-London agencies that have an impact on crime and community safety and local borough-level Community Safety Partnerships.

London Voluntary Service Council (LVSC)

LVSC is the collaborative leader of London's voluntary and community sector. We support London's voluntary and community organisations to improve the lives of Londoners. The voluntary and community sector (VCS) makes a huge contribution to the lives of Londoners, providing a range of services and support to the capital's diverse communities. LVSC brings together London's voluntary and community sector organisations to learn and share best practice and to create a co-ordinated voice to influence policy makers on issues affecting Londoners.

²⁴ A National Audit Office (NAO) review in 2010 endorsed found that every £1 spent on drug treatment saved the taxpayer £2.50 in reduced crime costs and improved health - National Treatment Agency for Substance Misuse (NTA) submission to the Home Affairs Select Committee drugs policy review 2012