

Mayor of London  
c/o Siobhan Coldwell  
Head of Strategy  
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10 Dean Farrar Street  
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**Date:** 6 March 2013

Via email: [policeandcrimeplan@mopac.london.gov.uk](mailto:policeandcrimeplan@mopac.london.gov.uk)

Dear Boris,

**Re: Draft MOPAC Police and Crime Plan 2013-2017 and Draft MOPAC/MPS Estate Strategy 2013-2016**

I am responding to this consultation on behalf of the London Assembly Liberal Democrat Group. We have real concerns about the proposals in the Draft Police and Crime Plan and Estate Strategy. These documents propose potentially huge changes to London's policing model and buildings, yet the impact of these changes is not clearly explained.

In particular we are:

- Opposed to **cuts to dedicated Safer Neighbourhood Teams**. Changing SNTs from the original model of a dedicated team of two PCs and three PCSOs per ward to only one PC and one PCSO decimates the successful neighbourhood policing model which has been built up over the past few years and risks going back to 'sector' policing which did not work.
- Opposed to proposals to **close 65 police front counters** across London. This will have a significant impact on Londoners' ability to access the police, and the Plan provides no evidence that improved replacement provision will be open before any closures take place.
- Concerned that the draft Plan and Estate Strategy **consultation has been inadequate**. Public meetings have been poorly publicised, and held for only an hour per borough. The documents have also not explained why proposals have been put forward and the associated costs.

We understand that you have set challenging targets for the police budget. The Metropolitan Police does need to save money, and this can be done. Their costs for some support functions (such as IT) are far higher than other police forces in the country. We also believe that you need to look again at other savings which could be made, including perks such as chauffeur driven cars for top police officers, so that front line services can be protected. We do not think that the consultation should set up a choice between maintaining police numbers or police buildings. This is a false dichotomy. The Plan should propose how the Police could share services and buildings, for example with the Fire and Ambulance Services and demonstrate that the MPS and MOPAC are genuinely looking at how they could work differently and more efficiently and effectively.

Our key concerns are outlined below.



**Caroline Pidgeon AM MBE**  
Leader of the London Assembly Liberal Democrat Group

## **Changes to Safer Neighbourhood Teams**

The headline of the Plan, that there will be “more officers in Safer Neighbourhoods than in October 2011”, is **misleading** and obscures some **fundamental changes** in neighbourhood policing. We are opposed to the proposals to **cut dedicated existing Safer Neighbourhood Teams** to a named sergeant, one dedicated PC and one dedicated PCSO (supported by a pool across a Local Police Area).

We are concerned about the Plan’s proposals to change neighbourhood policing because Londoners tell us that **the current SNT model works**. Research from the Home Office reported that neighbourhood policing achieved reductions in crime and an increase in public confidence if it included **visible, accessible and locally known** authority figures in neighbourhoods, particularly PCs and PCSOs.<sup>i</sup> Research in Sutton also demonstrated the value of local, dedicated, PCSOs for local problem solving and increasing public satisfaction with local policing.<sup>ii</sup>

We have continued to raise the issue of the importance of **dedicated and known** local officers with the Mayor and Commissioner, and welcome the Commissioner’s response that he will reflect on this.<sup>iii</sup> We suggest that the MPS should seek to **maintain the number of dedicated, locally known officers** allocated to wards.

### **• Redeployment of Specialist Teams**

Part of the reason that the Plan has a headline increase in neighbourhood teams is that officers are due to be redeployed from specialist borough squads, such as robbery teams. We have serious concerns about this change because the Plan does not explain the implications of this and is not clear about which specialist teams will be retained and which officers will be redeployed. Breaking up **youth teams**, for example, could have a significant impact on local communities.

### **• PCSOs**

We oppose cutting the number of PCSOs in London. PCSO numbers have already fallen considerably from a high of 4,705 in July 2009 to only 2,693 in January 2013, and the MPS plans to reduce the number further to 2,137 in 2013-16.<sup>iv</sup> We have several concerns about the risks around reducing PCSO numbers:

- PCSOs have a distinct role which focuses on **engaging local communities**. Changes mean that there will be less time and fewer PCSOs to build relationships locally. This could impact on crime reduction and public confidence targets.
- There is evidence that PCSOs are often better than PCs at engaging with **young people** and other harder to reach groups.
- PCSOs are also far more diverse and representative of London’s population than police officers.

MOPAC should **stop the proposed cut to PCSO** numbers and should look again at the policing budget.

## **Public Access – Front counter closures**

We strongly object to the proposal to close 65 police front counters. The Plan should acknowledge that **front counters are important** – particularly for reporting serious crimes. We have raised with the Mayor that **one in four rape offences** were reported at front counters in 2009-10. Online and telephoning reporting of crime is not appropriate for all types of crime, and it is also not acceptable for victims to face reporting serious crimes at new pop-up contact points in supermarkets.<sup>v</sup>

The proposals contained in the Plan **do not meet Mayoral commitments on improving access**. The Mayor has previously stated that “no police front counter will be closed unless we can provide the people with equivalent or superior access to the police” and that there would be “direct equivalence and...no loss of cover”.<sup>vi</sup> We do not believe that the Plan provides sufficient detail to guarantee that there will be equivalent or superior access to the police for Londoners if 65 front counters are closed.

## **Inadequate consultation – information which needs to be provided to Londoners**

The consultation on the Draft Police and Crime Plan and Estates Strategy has been poor. The consultation meetings have been poorly publicised, and the consultation documents have not provided a sufficient level of detail to enable Londoners to make informed responses to the consultation. Many constituents have asked us which police stations are going to be sold or where the proposed contact points are going to be located - which we are not able to answer as the information is simply not available.

### **• Police Officer Numbers**

The draft Plan contains a chart with Safer Neighbourhood and Total Borough officers, by borough, in October 2011 and projected for 2015. There have been questions raised locally about these numbers, for example whether they include vacant posts, and why October 2011 was picked as a baseline.<sup>vii</sup> We want accurate, honest, police officer numbers and for there to be growth of officers year on year. Therefore the final Plan must be **clear about budgeted police officer numbers** and use an understandable and recognisable measure of neighbourhood and total borough officer and PCSO numbers which can be compared across time and areas, and be easily monitored.

### **• Evidence base for the Estate Strategy**

The draft Plan and Estate Strategy do not explain by what criteria the 65 front counters proposed for closure have been chosen. We are concerned that the closures may be based on **out of date footfall survey** figures from 2010 which are not a good basis for the consultation, especially where counters have moved.

The Plan also contains no assessment of the likely impact on the **queuing times** at the, often already very busy, remaining police front counters if 65 are closed. The Plan also provides no assessment of the impact of closures geographically, across borough boundaries. Under current proposals **huge areas will be left without front counters**, which would have significant impacts on Londoners' **travel time** to front counters. It is also concerning that no **Equality Impact Assessments** of the proposed changes to public access were published with the consultation.

### **• Detail in the Estate Strategy**

Several other elements of the Estate Strategy are also unclear, including:

- Which **police stations and buildings the Mayor plans to sell**, the timescales, and what further consultation will take place.
- The planned **opening hours** of the retained front counters.
- The **cost benefit analysis** of the proposals (for example, it is proposed to close Crosspoint House front counter in Sutton which has only recently opened after significant investment).<sup>viii</sup>
- The **savings** which are anticipated from each part of the Estate Strategy, and the expenditure planned for others.

Providing this information would enable better scrutiny of proposals in the Estate Strategy and for suggestions to be made about alternative options (as we did in our Budget Amendment).<sup>ix</sup>

### **• Safer Neighbourhood Team bases**

Another key part of the police estate in terms of the provision of local policing are **SNT bases**. Whilst many of these are not open to the public, the bases enable SNTs to be based in or near to the communities they work with. Plans to sell off bases and police stations could mean that SNTs spend far more time **travelling across boroughs** rather than being out patrolling local neighbourhoods.

### **• New contact points**

We are not against providing additional police services with other trusted services in accessible locations. However, the Mayor must provide much more information to enable Londoners to see what proposals will mean for their local area and judge whether the new public access proposals will meet the criteria of providing improved replacement provision for any counter which closes. If the Mayor does insist on going ahead with closing front counters and creating new contact points, the Plan should set out:

- the **budget** for the provision of new public access points;
- the **timescale** for opening them, and confirm that no police front counters will close before equivalent or improved new public access facilities have been opened;
- the proposed **locations** and **opening hours** of new contact points, including confirming their accessibility;
- **what it will be possible to do** at these new contact points – there have been suggestions that the facilities they offer may be limited and not include crime reporting.

### **Other sections of the Plan which we have particular concerns about, and need improving:**

#### • **Plan Priorities**

It is not clear why the particular ‘key crime’ types have been chosen for targeted crime reduction, or why the 20% targets have been decided upon.<sup>x</sup> In particular, we are concerned that:

- The 20:20:20 challenge **excludes many crime types** which are public priorities, such as **gun and knife crime**, and that the Plan does not set any measured targets for how the police deal with **rape and sexual offences**.
- The objectives do not fully recognise the important role **crime prevention** work can play.
- The objectives overlook the fact that at the moment local ward panels play a key role in deciding **local priorities**. The Plan is unclear about what role local community engagement will play in shaping police priorities.

#### • **Targets and monitoring**

The Plan lacks detail. Londoners expect that there should be: clear targets for tackling organised crime; clarification of the number of public order trained officers and what the targets are around the number of trained officers required; clear targets around reducing reoffending and improving resettlement, rather than limited to reducing the reoffending of young people leaving custody as currently drafted; detail about the timetable for the production of the proposed alcohol related crime strategy and the drugs strategy, as well as how they will be enforced and monitored.

#### • **Stop and Search**

Given the significant concerns about the use and practices of stop and search the Plan should provide more details about how the MPS is responding to concerns and also how MOPAC intends to monitor and report on the use of the range of search powers the MPS has.

#### • **Civil Liberties**

We are very concerned by the MPS’s plans to “to develop a “ring of steel” around London using number plate recognition technology. The civil liberties implications of this are very worrying, particularly if this is already taking place prior to public consultation, and we request that clear safeguards are put in place.

#### • **Violence against women and girls**

The Plan should contain far more detail about how MOPAC and the MPS are tackling violence against women and girls. It is very concerning that the Plan does not appear to prioritise tackling rape and sexual violence, or domestic violence; particularly in light of the recent IPCC investigation into the MPS’s approach to recording rape and sexual violence.<sup>xi</sup> Additionally we are concerned that there is still no detail about the “pan-London domestic violence” service which was promised in the Mayor’s manifesto and is referred to in the Plan.

#### • **Hate crime**

This section of the Plan needs strengthening. Specifically it should also discuss disability and race issues. We would also encourage MOPAC to look at how the MPS categorises crimes, for example whether hate crimes are in some cases recorded as anti-social behaviour. This will require close working with local communities and voluntary sector agencies who are often already doing excellent work on the ground to tackle hate crime.

- **Dangerous Dogs**

We would suggest this section should also address the issue of dog breeding.

- **Young offenders**

The draft Plan refers to the “success of the Daedalus pilot”. We are supportive of new and innovative projects to reduce reoffending and improve resettlement outcomes, but suggest that conclusions from this pilot are referenced with more caution given that the final evaluation report noted limitations to the Daedalus study,<sup>xii</sup> We would welcome clearer targets for the new resettlement support programmes, and details about how the success of those programmes will be assessed.

- **Reparation**

We strongly disagree with proposals of imposing enforced sobriety on substance-misusing offenders. We question the appropriateness of the **alcohol abstinence** pilot proposed in Sutton and Croydon. This programme appears to be based on the South Dakota model, designed to target drink drivers, a very different cohort of offenders to London and was also based on a very different legal system. The Ministry of Justice Impact Assessment is also unclear about the scheme’s outcomes.<sup>xiii</sup> We also question the applicability of the **drug abstinence** HOPE probation programme used in Hawaii to London (p.30). Any schemes set up in London would need to ensure that good support, especially health support, ran alongside. The final Plan should provide firm evidence for why these particular approaches should be piloted, and must be developed with health partners to find the best solutions for offenders with multiple and complex needs.

### **Other key crime and safety issues that should be included in the Plan:**

The draft Plan currently does not address several important areas which we think are key issues for tackling crime and improving safety in London, and we recommend that the following issues are addressed in the final Plan:

#### **Implementing the Cardiff Model of A&E departments sharing information**

It is disappointing that, despite extensive evidence demonstrating the impact on crime levels of A&E departments sharing information about knife or gun attacks with the police and local councils, not all A&E departments in London are sharing such data.<sup>xiv</sup> We would welcome greater detail in the final Plan regarding how MOPAC is planning on working with Health and Wellbeing Boards to tackle crime and share data across London, particularly given the importance of working to reduce gun and knife crime in London.

#### **Mental Health**

The Plan also needs to be far stronger in terms of partnership working with mental health services, and training for the police around mental health issues. We are concerned that the current draft of the Plan does not specifically refer to mental health. The offending population is widely recognised as having multiple needs, including mental health, drug, alcohol and accommodation issues and that a joined-up approach is needed to effectively address these problems and reduce reoffending.<sup>xv</sup> Campaign groups such as Black Mental Health have also highlighted that people who use mental health services account for 50% of those who lose their lives in police custody, and it is in the area of mental health and policing that many of the most serious causes for complaints occur.<sup>xvi</sup>

#### **Vulnerable Adults**

The draft Plan begins by saying that “The Mayor must work with partners to prevent and tackle anti-social behaviour, crime and re-offending as well as protecting the vulnerable” (p.5). However, apart from commitments to support vulnerable young people, the Plan does not expand upon this. Given the IPCC findings when investigating the Pilkington case, we are concerned that the Plan should cover MPS policy with regards to identifying and supporting vulnerable adults and families.<sup>xvii</sup> We note and welcome the fact that the MPS has signed up to Mencap’s ‘Stand by me’ campaign to end disability hate crime.<sup>xviii</sup>

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- <sup>i</sup> See: *An evaluation of the impact of the National Reassurance Policing Programme*; Tuffin, Morris and Poole (Home Office Research, Development and Statistics, 2006)
- <sup>ii</sup> See: *Can we speak in confidence? Community intelligence and neighbourhood policing v2.0*; Trudy Lowe, Martin Innes (Policing and Society, Vol. 22, Iss. 3, 2012)
- <sup>iii</sup> "I think there is one point that you have made before and has made me reflect, which is that the rest of the team need to be equally known. I think that is a fair point and it is something that we can take away and work on in terms of communication...". Extract from [Transcript](#), London Assembly Police and Crime Committee, 14 February 2013, p.22.
- <sup>iv</sup> [http://data.london.gov.uk/datastorefiles/datafiles/crime-community-safety/mps-figures\\_Jan13.xls](http://data.london.gov.uk/datastorefiles/datafiles/crime-community-safety/mps-figures_Jan13.xls) for current and historic PCSO figures. In answer to MQ [571/2013](#) the Mayor stated that "The draft budget for 2013/16 reflects a proposed total borough PCSO level of 2,091. This includes posts funded by Local Authorities and TfL. This is expected to remain at this level for each of the three years." Including other business groups the total is 2,137. [Appendix 4](#) to that question provides a borough breakdown of PCSO allocations for 2013-16.
- <sup>v</sup> See: *Reporting Domestic and Sexual violence to MPS Front Counters*, Report for the Domestic and Sexual Violence Board (MPA, 15/02/2011). "During the 2009 to 2010 fiscal year 15% of crimes were reported at front counters. 36.4% of victims of total crime reported to the MPS are from BME communities while 41.2% of victims who report crime via the front counter are from BME communities. 19.5% of victims of rape and sexual offences combined reported to the front counter (24% of rape victims)".  
<http://policeauthority.org/Metropolitan/dsvb/2011/0215/01c/index.html>
- <sup>vi</sup> In answer to Mayoral Question [3365/2012](#) from Caroline Pidgeon
- <sup>vii</sup> The draft Plan does not explain what the officer numbers are in the chart – e.g. if these posts are filled and budgeted for. The numbers differ from those provided on the London Datastore. Based on the Datastore figures, for several boroughs the total borough officers figures for October 2011 are higher than those quoted in the Plan – which means that the change in officers to 2015 could be overstated. Looking at the Datastore, May 2010 would appear to be a highpoint in officer numbers in several boroughs. <http://data.london.gov.uk/dashboard-summary/crime>  
[http://data.london.gov.uk/datastorefiles/datafiles/crime-community-safety/mps-figures\\_Jan13.xls](http://data.london.gov.uk/datastorefiles/datafiles/crime-community-safety/mps-figures_Jan13.xls)
- <sup>viii</sup> <http://policeauthority.org/metropolitan/committees/finres/2011/0414/07/index.html>
- <sup>ix</sup> The Liberal Democrat Group on the London Assembly put forward an alternative Budget to the Mayor's which included providing additional funding to safeguard police front counters and PCSOs.  
<http://glalibdems.org.uk/en/document/putting-homes-jobs-and-the-safety-of-londoners-first-liberal-democrat-london-assembly-group-propose-radical-changes-to-the-mayor-s-budget.pdf> (February 2013)
- <sup>x</sup> The 'key crimes' have been defined as burglary, vandalism, theft of, and theft from motor vehicles, violence with injury, robbery and theft from the person.
- <sup>xi</sup> *Southwark Sapphire Unit's local practices for the reporting and investigation of sexual offences, July 2008 – September 2009* (IPCC Learning Report, February 2013)  
[http://www.ipcc.gov.uk/Documents/investigation\\_commissioner\\_reports/Southwark\\_Sapphire\\_Units\\_local\\_practices\\_for\\_the\\_reporting\\_and\\_investigation\\_of\\_sexual\\_offences\\_july2008\\_sept2009.PDF](http://www.ipcc.gov.uk/Documents/investigation_commissioner_reports/Southwark_Sapphire_Units_local_practices_for_the_reporting_and_investigation_of_sexual_offences_july2008_sept2009.PDF)
- <sup>xii</sup> See: Caroline Pidgeon's discussion of Project Daedalus with Stephen Greenhalgh  
<http://mqt.london.gov.uk/mqt/public/question.do?id=45276>. Also see: *Evaluation of the London Youth Reducing Re-offending Programme (Daedalus), Final report* (IPSOS Mori, November 2012)  
[http://www.london.gov.uk/sites/default/files/LYRRP%20\(Daedalus\)\\_Final%20Report\\_1.pdf](http://www.london.gov.uk/sites/default/files/LYRRP%20(Daedalus)_Final%20Report_1.pdf), see especially p.107. Limitations to the study included the lack of comparison group, that the participants were likely to be motivated to change, and that young people were removed from the scheme during the course of the pilot.
- <sup>xiii</sup> <http://www.justice.gov.uk/downloads/legislation/bills-acts/legal-aid-sentencing/laspo-sobriety-ia.pdf>  
"The extent to which compulsory abstinence may reduce re-offending is not known"
- <sup>xiv</sup> MQ [777/2013](#)
- <sup>xv</sup> Stewart, D. (2008) *The Problems and Needs of Newly Sentenced Prisoners: Results from a National Survey*, Ministry of Justice Research Series 16/08. Quoted in *Repeat offenders with multiple needs in London* (Revolving Doors Agency, April 2012). <http://www.london.gov.uk/moderngov/documents/s22210/6%20-%20Summary%20List%20of%20Actions%20-%20APPENDIX%20B.pdf>
- <sup>xvi</sup> <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmhaff/494/494we06.htm>
- <sup>xvii</sup> <http://www.mencap.org.uk/news/article/police-failings-fiona-pilkington-case>
- <sup>xviii</sup> <http://www.mencap.org.uk/news/article/support-hate-crime-campaign-metropolitan-police>