



Strategic Policing and Crime Board

22 February 2022

Police and Crime Plan Priority: West Midlands Police

Title: Preventing and Reducing Crime

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Purpose of paper

1. This paper provides an update to the Strategic Policing and Crime Board on the measures West Midlands Police (WMP) are taking to prevent and reduce crime with a particular focus on fraud/cyber, business and acquisitive crime.
2. The report focuses on crime trends that have an economic impact on people and organisations, as well as strategies adopted by WMP to Prevent, Protect, Prepare and Pursue (4P) crimes of this nature.

Background

3. WMP recognises the impact fraud/cyber, business and acquisitive crime types can have on communities and businesses, and by working collaboratively with partner agencies, have implemented effective strategies for targeting and preventing these crime types. Whilst fraud victimisation has increased between 2020 and 2021, WMP are utilising partner agency data to identify and predict future trends to set priorities for the forthcoming year. Various processes have also been implemented to address the rise in violence against shop workers and WMP continue to work with local businesses to offer target hardening and crime prevention advice. Despite overall neighbourhood crime witnessing an increase over the past year, when compared to a pre-Covid baseline (2019/2020), burglary and robbery reductions have remained strong. It is however recognised that other crime types such as theft from motor vehicle has significantly increased which will remain a force tactical priority.

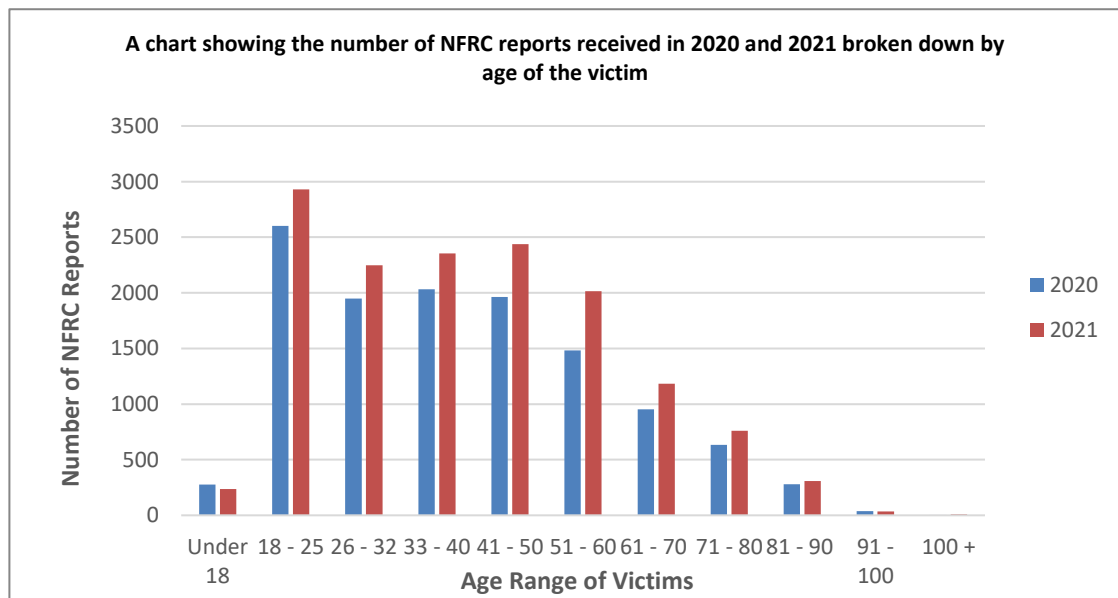
Fraud and Cyber Crime

4. Fraud is when deception is used to gain a dishonest advantage, which is often financial, over another person. Cyber crime is a term relating to any criminal act involving the use of computers and networks (e.g. hacking) as well as more traditional crimes conducted using technology.
5. Action Fraud is the national reporting centre for fraud and cyber crime. The service is run by the lead Force for Fraud, the City of London Police. The National Fraud Intelligence Bureau (NFIB) are responsible for assessment of the reported fraud or cyber offence to identify lines of enquiry and ensure all fraud reports are allocated to the most appropriate investigative agency.
6. The Economic Crime Unit (ECU) within West Midlands Police is a specialist department within Force Criminal Investigation Department (FCID) that is responsible for financial investigations across the force. ECU is accountable for the investigation of all complex fraud, cyber dependent offence, electoral malpractice, money laundering and leads on asset recovery - utilising the Proceeds of Crime Act (POCA).
7. According to the Office for National Statistics (2020), people are more likely to fall victim to fraud or cyber offences above any other crime type. Recent data published by the Office for National Statistics (2021), states there has been large increases in fraud offences over the past year, with particular rises in 'consumer and retail fraud' and 'advance fee fraud' – possibly linked to the behaviour changes related to the global pandemic such as increased online shopping.
8. Between 2020 and 2021, there has been a growth in overall fraud victimisation in WMP from 13,331 to 15,555. Over this period, there has been significant growth in a number of fraud categories identified by the National Fraud Intelligence Bureau (NFIB). The categories with the greatest increase include: -
 - Share sales or Boiler Room Fraud¹ (+46%) – NFIB2A
 - Dating Scam (Romance Fraud) (+44%) – NFIB1D
 - Rental Fraud (+43%) – NFIB1G
 - "419" Advance Fee Fraud² (+42%) – NFIB1A
 - Ticket Fraud (+30%) – NFIB3F

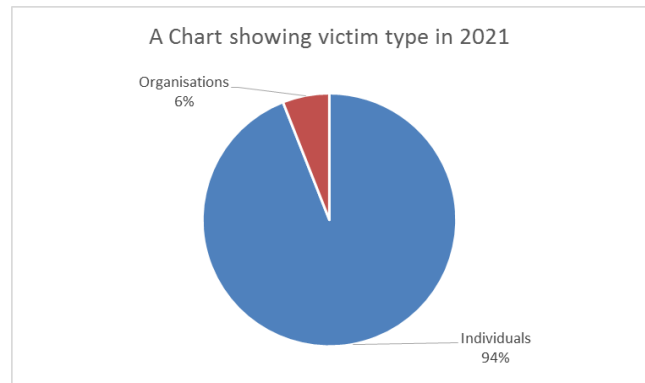
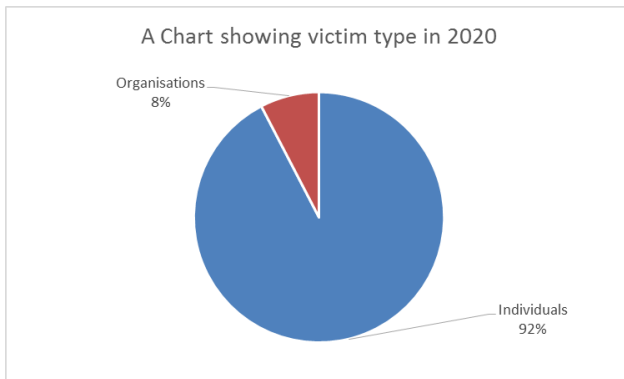
¹ This type of fraud involves criminals "cold calling" the victim to convince them to invest in companies or products that are worthless or do not exist. Once payment has been received, the criminal will cease contact with the victim

² This type of fraud involves criminals contacting victims and asking them to pay an administration fee to assist in the transfer of a large amount of money from one country to another with the promise of a proportion of the transferred money at a later date to pay for this service. These emails can originate from countries such as Iraq, South Africa or West Africa (Ivory Coast, Togo or Nigeria). "419" is taken from the Nigerian criminal code

9. NFIB 90 is the most frequent selected type of fraud disseminated to all forces across the country. NFIB 90 essentially refers to classification of fraud that does not fit into a single category e.g. romance fraud.
10. This lack of clarity provided by NFIB has led to a difficulty in providing a detailed analysis of the 'other' fraud types and any trends that may be emerging within. Whilst there are already a significantly large number of 'categorised' fraud types for WMP to progress, adding further categories may create uncertainty regarding the most important crime types. Whilst the categorised crime types have not changed since 2016, the NFIB code 90 could pose less of an analytic barrier if forces could be confident that offence types that fall into this category hold less statistical importance. Despite this, one area of concern focuses on the lack of categorisation code for courier fraud which is a significant high harm offence type that the City of London Police run specialised intensification projects for. As a result, the categorisation of courier fraud is often dependant on the data inputter reviewing the report as it could inadvertently be overlooked and appear alongside the 'Door to Door' fraud categorisation or NFIB 90.
11. The chart below shows the number of National Fraud Reporting Centre (NFRC) reports received in the two reporting periods; 2020 and 2021, broken down by age of the victim. This identifies there has been a broad growth in all age ranges, with a particular large increase seen in the 41- 50-year-old bracket (+24%), 51- 60-year-old bracket (+36%), and 61-70-year-old bracket (+24%).



12. In contrast to the personal crime data above and as highlighted below, WMP has seen a decrease in reporting from organisations from 8% of all reports in 2020, to 6% of all reports in 2021. There has also been a marked decrease in the total average loss by victims over the time period. In 2021, the average loss for all individual victims was £4,599.00, which has decreased from £20,390.76 in the preceding year. The average loss detailed below is broken down between individual and organisation-based victims.



	2020	2021
Individuals	£20,390.76	£4,599.00
Organisations	£32,769.90	£19,801.01
Total	£53,160.66	£24,400.01

13. In order to ensure a victim focused approach, WMP Economic Crime Victim Care Unit (ECVCU) provides a bespoke service to victims of economic and cyber crime. The ECVCU has a direct link into Victim Support for access to additional long-term support services. The ECVCU is a support mechanism and is not an investigation tool or means to recover funds for victims. The service aims to educate, protect and prevent victims from being repeatedly targeted which is tailored at the individual's needs. Following this, the service provides victims with preventative material and resources such as protect booklets and call blockers which are funded by POCA.

ECVCU can provide advice in the following areas:

- Banking/financial safeguarding issues
- Internet safety
- Lasting Power of Attorney
- Banking Protocols
- Current fraud/scam trends

14. In addition to individual victims of crime (personal crime), the ECVCU are also involved in local business and stakeholder crime prevention which includes public facing Cyber Crime Reduction Webinars that focus on speaking to local residents and businesses.

15. City of London Police provide WMP with weekly Action Fraud Victim data lists, which includes the details of those who have reported an incident to Action Fraud during the previous week. Due to the high number of victims and the operational constraints within the ECVCU, this data is further filtered with reference to three categories:

- Is a victim of Romance Fraud
- Is a victim aged 70 years or over
- Scores highly on National Decision Model score³

Any victim who falls into one of these three categories is then referred into the ECVCU for support. An assessment of vulnerability is then made in order to determine the level of support required.

16. WMP are utilising partner agency data to support our Prevent, Protect, Prepare and Pursue (4P) strategies. This includes data from the City of London Police, Office for National Statistics (ONS), National Crime Agency (NCA), UK Finance and Chainalysis⁴. All of these data sources assist with identifying trends and themes around offending types, geographic data, typographies and modus operandi, which enable WMP to set priorities for the next year and to monitor any emerging trends.

17. The ECU give specific focus to City of London Police led national intensification periods that are based on fraud trends and profiles. For example, romance fraud based campaign will be run around Valentine's day as it is shown there is a marked increase in victimisation during this period.

The activity carried out by WMP in response to these intensification periods generally includes: -

- Increased activity such as visiting / contacting all identified victims
- Completing data returns more frequently
- Supporting protect messaging through our social media channels
- Increased support in apprehending outstanding suspects

18. WMP are also working closely with Trading Standards to build a multiagency approach to deal with victims of fraud in order to improve the process of identifying vulnerable repeat victims. This is assisting with enhancing the Protect work around safeguarding and will remain a focus throughout 2022.

³ This is a risk-based score applied to each victim by the NFIB on receipt of a report of fraud offences. Those identified at highest risk are then contacted by the ECVCU

⁴ Chainalysis assesses cyber trends in crypto markets

19. WMP is required to submit monthly outcome returns to the City of London Police. This return provides details of the fraud reports that have filed that month and includes the outcome code for that offence. WMP has met this requirement each month and have a 100% compliance rate for all data returns.
20. The City of London Police also request that a victim questionnaire is completed for all victims of romance fraud. This is for intelligence gathering and analysis purposes. In January 2022, it was confirmed that WMP submitted more returns in December 2021 compared to other forces within the United Kingdom.
21. In addition, the ECVCU send further performance reports detailing the number of impressions from social media posts and/or the number of people who engaged with an outreach Protect or crime prevention event. This is a simplistic, non-scientific way to measure WMP reach in the Protect work as there is no direct quantifiable method to ascertain how effective a social media post is, or how many frauds it prevented. The figures are reported to the City of London Police via Agency Partner Management Information System (APMIS).
22. There is currently one 'Crash for Cash'⁵ case under investigation by WMP ECU as the majority of investigations into this type of crime are led by the Insurance Fraud Enforcement Department (IFED) within the City of London Police. WMP ECU Operation Tyrell is under investigation and it is anticipated that early investigative advice will be sought from the Crown Prosecution Service (CPS) with a view to obtaining charges shortly. The aforementioned investigation has also been the subject of discussions during the planning phase of the 'Crash for Cash' intensification period.

Business Crime

23. Business crime refers to any criminal offence that is committed against a person or property which is associated by the connect of that person or property to a business. This is a broad area of crime and thus, this paper will seek to respond to the specific requests relating to assaults against shop workers and the 'Offender to Rehab' programme.
24. Violence against shop workers was highlighted in 2021, following the rise in threats and/or violence against staff. The three main triggers for violence against shop workers were identified as shop theft, Covid-19 restrictions and age restrictions. Offences that occurred within the height of the pandemic were reported into Operation Colonel – WMP response to Covid-19, to identify the scale of the crime, as well as repeat victims and locations. This ensured appropriate crime prevention advice and tracking of cases through the Criminal Justice System. Incidents involving

⁵ 'Crash for cash' scams are run by fraudsters who stage accidents, sometimes with innocent road users, to profit from fraudulent insurance claims.

violence against shop workers are now tracked through local daily management meetings as part of business as usual. All victims are offered the opportunity to provide victim personal statements (VPS) to ensure their views, the impact of the crime, repeat victims and aggravating factors are brought to the attention of Her Majesty's Courts and Tribunals Service for sentencing.

25. WMP continue to work with a number of retailers to offer advice on the physical layouts of stores in relation to adopting design out crime methodologies. All of which will reduce the risk of harm to the staff and limit the opportunities for perpetrators to carry out attacks on the staff. As an example, WMP is currently working closely with One Stop convenience stores and Central Counties CO-OP stores to provide crime prevention advice and implement target hardening strategies.
26. Assaults against shop workers are accurately recorded by WMP however, the Connect system that was launched in 2021 does not allow for easy identification of this nature of offence due to certain fields not being mandatory. There are pending improvements to the data quality, as the force is working closely alongside the suppliers to understand how the system can be configured differently for mandatory completion. WMP are aware of the national survey conducted into shop work assaults, as well as the national work supported by the National Business Crime Centre.
27. In July 2021, following a successful pilot on Birmingham East Neighbourhood Policing Unit (NPU), the 'Offender to Rehab' programme has been expanded across Birmingham. The project provides a holistic approach and identifies prolific offenders who are involved in high-volume low-level crime and who demonstrate a willingness to address their offending behaviour. The project also offers support around complex needs such as drug addiction. The business crime co-ordinator is supporting governance and reporting of the programme by working closely with the oPCC and research consultancy who will be providing an independent evaluation at the end of the pilot. The evaluation is expected in July 2022, with the project running to the end of 2022, which will allow time for WMP to decide on the next steps.

Acquisitive Crime

28. The WMP approach to effectively prevent, reduce and investigate acquisitive crime is rooted in the development of a clear understanding of the nature of offending, the type of perpetrators (their motivation), the sphere of operation (both geographically and in terms of their organisation) and the scope of the offending (local, regional and national).
29. Over the past year, neighbourhood crime⁶ has increased, although the pandemic resulted in a lockdown for the majority of 2020; thus, making it challenging to compare. When compared to a pre-Covid baseline (2019/2020), burglary offences

⁶ The national measure for neighbourhood crime includes burglary, robbery, theft from the person and vehicle theft.

have decreased by 19%, robbery has decreased by 5%, although theft of motor vehicle is increasing significantly (+24%) and is now a force tactical priority driven by worldwide shortage of car parts.

30. WMP is working to reduce the number of outstanding suspects for serious acquisitive crimes awaiting investigation, individual incident reports are reviewed by supervisors and where evidence exists to facilitate an arrest, outstanding offenders are added to the Police National Computer (PNC) as 'Wanted Missing'. Arrests are prioritised using Connect and through daily management meetings based on threat, harm, risk and vulnerability factors. There has been positive progress in reducing the number of outstanding Burglary and Robbery offenders following a recent force initiative called Operation Maximise.

Robbery and Burglary

31. There are geographically aligned subject matter experts (SME) who respond to tackling robbery and burglary residential offences by being proactive and intelligence led using victim/offender/location model. The 4P approach is utilised throughout the governance and operational aspects of all areas of acquisitive crime as below:

Pursue

- Improve the quality of initial response/primary investigation which involved response feedback and training. Regular DIP sample returns and specific case reviews are being undertaken and more recently, an input has been delivered regarding the use of street identification.
- Governance/focus on outstanding offenders and wider force support, notably through NPU resources, to locate and arrest those 'Wanted Missing' for robbery. The use of NPU Thrive Review Meetings has also helped support requests which are monitored by FCIDs Service Improvement Meeting (SIM).
- Maximise identification evidence tactics by focusing on the use of ID parades with the support from the ID Bureau. Reduce time from suspect identification to ID parade request/witness viewing.
- Escalation of Pre-charge Decision (PCD) cases with CPS where the Service Level Agreement (SLA) for advice was not met.

Prepare

- Force intelligence support to complete tactical documents linked to under 25 violence to enable identification of emerging trends and direct resources.
- Thematic alignment with NPU/FCID of under 25 violence/robbery.
- FCID to ensure thematic governance of robbery through High Harm teams.

Prevent /Protect

- Cultural change to increase offender focus concerning under 18's. Increased use of out of court disposal (O OCD) pathways with support from Youth Offending

Services (YOS) to engage, educate and divert - where applicable. The aim is to prevent further offending without seeking to criminalise young people where possible.

Prevent /Pursue

- Publicise and increase usage of check services (stolen mobile device register).
- Seek to re-instigate the Magpie cohort⁷.
- Operation Guardian bid for dedicated resource within robbery hotspots and funding for additional staff (Redsnapper funded posts to support OOC work in Birmingham East and Birmingham West areas).

32. This co-ordinated approach underpins and enables a detailed understanding of the diverse threats each geographical area might experience for example, car key burglary, addiction motivated offending or organised criminality. Daily management between the practitioners responsible for frontline delivery through to senior management has led to the development and implementation of key strategies and operations designed to address and dismantle these crime types together with deployment of the most appropriate resources best equipped and positioned to respond immediately. Tactical operations supporting these broad approaches are clearly visible in the following operating models. The following are examples of tactical operations support these approaches: -

Operation Cantil

33. This operation relates to an ongoing mission implemented through the Force Tactical Delivery Board process to primarily address car key criminality⁸. The ongoing initiative is a cohesive cross-department partnership approach from road policing units (CMPG), FCID, offender managers and NPU's working together to tackle and reduce car key offences. The focus on gathering intelligence more effectively is enabling an enhanced ability to identify and apprehend offenders, as well as help to predict and prevent future offending.

34. By utilising experienced roads policing staff alongside FCID and offender management teams, Operation Cantil has enabled the expertise of all to be co-ordinated and implemented simultaneously to achieve greater success in tackling this type of criminality. Subsequently, when an offence is reported, there is now a greater ability to understand the crime and to identify the potential/likely offenders. The approach is now beginning to reap dividends due to a reduction in these types of offences, with 2,636 suspects arrested since its inception in September 2018. This figure includes 785 suspects arrested for burglary and car theft and the recovery of 1,096 stolen cars.

⁷ A Magie cohort is a group of officers responsible for monitoring all intelligence related to handling stolen goods, with a clear focus on enforcement against second hand shops.

⁸ A car key burglary is a crime where an individual breaks into a home with the specific aim of removing the car keys and stealing the car.

35. Continuing analysis has highlighted a trend amongst young men and teenagers, often with no previous criminal behaviour or convictions, being recruited by seasoned offenders to offend on their behalf. Young men, often below the age of 20 years, are being targeted by offenders who no longer want to take the risk of conviction and imprisonment but who still want to thrive of the financial benefits associated with car key crime. They often persuade young people with the lure of cash and other material possessions to take the risk, telling them the police cannot do anything as they have no previous convictions. A vast amount of serious offending among young people is being discovered and prevention forms part of the longer-term Operation Cantil strategy to establish links between offenders and identify the organised crime gangs who are employing and exploiting them through neighbourhood, intelligence and response-based policing.

The Crime Free Programme (FCID Prevent Strategy for Burglary)

36. The Crime Free Programme is an intensive multi-agency rehabilitation programme which provides the offenders of burglary residential offences a choice and opportunity to change their offending behaviour. This is achieved through strong support and mentoring network delivered by WMP, probation and a number of other partner agencies over a three-year period, the programme is supervised in the community and sanctioned as an alternative to prison. The multi-agency approach targets prolific, non-violent, adult burglary residential offenders who are trapped in a cycle of addiction, crime and prison. It delivers a bespoke, flexible and robust rehabilitation and intervention plan to break up the cycle of crime and support long term lifestyle changes.
37. The aim of the programme is to reduce the number of burglaries the offenders commit, enhance victim satisfaction through restorative justice and increase the number of positive outcomes. It also provides a more in-depth understanding of the triggers/motivating factors for offending which in turns, assists WMP with the formulation of stronger preventative strategies around burglary offences in the future from all perspectives i.e. victim, offender and location.
38. Eligibility is dependent on the participant being willing to admit to all of their previous criminal history to the police, with an open and honest conversation taking place over a number of days. This information enables all agencies to identify the most appropriate strategy to prevent re-offending, identify the correct pathways of rehabilitation before their release, and to facilitate restorative justice with all of their victims.
39. Upon successful completion of the assessment phase, the participants are given a community order instead of a custodial sentence and, together with all relevant agencies, are required to reappear before the court to determine progress on the programme so that appropriate changes to the rehabilitation strategy can be made. This is in order to maximise the chances of successful positive change, as well as providing the opportunity to address any areas of concern or requirements for immediate improvement. Any breaches of the community order are presented to the resident judge, who reserves the right to re-sentence, not only for the original offences, but for all further offences admitted by the participant. In practice, this

results in the defendant receiving a substantially increased prison sentence. This deterrent within the programme helps to motivate participants to fulfil the requirements and break the cycle of offending and prison.

40. Since November 2017, the Crime Free Programme has resolved 950 residential burglaries and a large number of other offences including commercial burglary, and vehicle crime; resourced with six members of staff and no designated funding. The programme would present greater opportunities with additional resources.
41. The stakeholders which include police, probation and housing, oversee the subsequent management and after care of each candidate following on from their successful enrolment. A large amount of stolen property has been recovered and returned, and several restorative justice sessions have been conducted. At present around 65% of the cases are successful.
42. In order to provide the best possible victim care and support, in alignment with the Victim's Code, WMP High Harm Team have implemented the following approach to ensure a consistent standard is delivered to all victims. The five steps focus on initial and continual contact with victims, the quality and frequency of the updates provided, as well as the appropriate safeguarding and referrals to other partner agencies.

The five-step approach is:

- Ensure the victim(s) are aware the report is being filed.
- Ensure victim(s) are aware of the investigating officer within seven days of the crime being recorded.
- Ensure a contact plan is established with the victim(s) and compliance is monitored.
- Ensure the victim is informed within five days of any arrest, charge or caution.
- Ensure the details of relevant organisations who can offer support are provided to victims.

Vehicle Crime

43. WMP continue to work closely with the motor vehicle industry to understand the current trends and issues associated with the crime type. The collaborative approach led by a Superintendent SME, ensures there is a 4P focus with regards to training officers around the modus operandi of thefts, as well as appropriately targeted communication to our communities to aid target hardening around vehicle types and locations. All key stakeholder departments across the force are aware of the 4P approach and have defined roles to support the delivery.
44. Representatives from WMP work closely with The National Police Chiefs Council (NPCC) to ensure the evolving national picture around vehicle crime is understood and that information shared appropriately. The WMP Design Out Crime Manager⁹,

⁹ The principal role of the crime prevention design team is to provide specialist guidance and advice concerning the planning process, influence designers, developers and architects to incorporate crime reduction measures into new and existing developments

sits on the national panel and also liaises directly with industry, sharing messaging/intelligence into force so this can be targeted accordingly. Locally, WMP have strong links with Jaguar Land Rover (based on Solihull Policing area) and engage in regular meetings with their crime reduction team in order to share information and understand changes in technology in respect of vehicle theft. WMP have also engaged with industry representatives to develop videos in respect of devices used to steal motor vehicles, in order to enhance officer/staff training around identifying devices, together with how they are used.

45. WMP policing units are tasked with working closely with industrial site owners, in order to establish/locate sites which have been and could also be used for dismantling vehicles, ensuring appropriate enforcement is carried out when necessary. In addition, the design out crime team offer support to improve security and offer advice in those areas, working with local landlords and councils. Local authority/environmental health partnership working is also carried out to assist with scrap yards and other vehicle storage outlets, to ensure the appropriate compliance, given these are often locations where stolen vehicles/parts are apprehended.
46. WMP have also implemented a proactive priorities team, which has the ability to react, investigate and identify series linked offending in order to effectively investigate organised vehicle crime.

Financial Implications

47. Resourcing has not been reduced from addressing fraud/cyber, business or acquisitive crime over the past two years with the exception of staff from the ECU who were seconded to deal with the recent demand seen within homicide. The movement of staff was co-ordinated and governed through FCID Workforce Strategy process for the duration of the secondments. The staff that were seconded to homicide have now all returned to their dedicated roles within the ECU.
48. In relation to acquisitive crime, no resourcing has been moved away and additional staff have been deployed into Birmingham West via increased funding through Operation Guardian. Birmingham West and Birmingham East High Harm Teams have also seen an uplift in staff through the Priority Based Budgeting (PBB) process.

Legal Implications

49. Victims' Code compliance is monitored by an audit survey that has been developed to assess WMPs adherence with the code. It involves a quarterly audit survey where a sample of circa 250 crime records are selected which are segmented across 5 offence groups: Burglary and Robbery, Hate Crime, Violence with Injury, Domestic Violence, and Other. The survey focuses on the areas of the Victims Code where information is generally available i.e. victim receiving an acknowledgement that the crime was recorded; victim updates being received in a timely manner (as defined by the Victims' Code); the victim being informed of the end of the CJS journey; where a need for support is identified, the victim being referred within two days and whether the victim is offered to make a VPS.

50. Assessing Victims' Code compliance can be problematic, as it is solely based on information that is available/recorded. In some cases, it is challenging to distinguish between incidents of non-compliance, and incidents where compliance isn't recorded – i.e. it may have been compliant but we can't say whether it was or wasn't due to a lack of information recorded/available.
51. In 2021, the Ministry of Justice requested that all Criminal Justice Service agencies complete a self-assessment on Victims' Code compliance processes and the level of reporting functionality/data available. This was completed in order to assist with the development of a Victims' Code performance framework which will inform the data items requests as part of the Victims' Code compliance return. During the most recent Victims' Code Champions meeting, an action plan, developed following the self-assessment exercise, was signed off which detailed the steps which needed to be taken to make compliance reporting and recording more accurate/reliable. This work will continue to be progressed following the recent retirement of the previous VCoP lead and the appointment of the new lead – Superintendent Phil Asquith.
52. With the recent implementation of Connect, it is anticipated that Victims' Code compliance will be reportable in due course. This is a long-term aim and will require the mandating of certain fields in Connect and a significant resource requirement to develop/link tables/reports within Qlick.
53. The specific crime types detailed within this report; fraud/cyber crime, business crime and acquisitive crime are not precisely assessed as part of the audit survey. Acquisitive crime would partially be covered by the category of Burglary and Robbery, which may also include some business crime offences. There is further consideration required regarding how fraud and cyber crime are, and should be, monitored in terms of the Victims' Code as these incidents are reported to Action Fraud in the first instance and certain sections of the code would relate to the initial handling of the report by Action Fraud.
54. A previous paper titled 'Victims' Code Compliance' was discussed at Strategic Policing and Crime Board on 15 February 2021 (Agenda item 5a) which acknowledged and highlighted these factors regarding the position and that no reportable data can currently be presented. WMP continue to work hard with the oPCC to improve this position.

Equality Implications

55. All activity undertaken by WMP in relation to the 4P model has careful consideration and due regard to the Public Sector Equality Duty (PSED).

Due regard focuses upon the requirement to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

56. In order to monitor the activity, the performance framework and governance (SIM/Strategic Delivery Board/WFS) is utilised. This is further supported through the departmental Appropriate Authority and Victims' Right to Review/complaints procedure. All operational and investigative initiatives are subject to individual decision making and no overarching Equality Impact Assessment is completed for such individual initiatives.

Next Steps

57. The board is asked to take note of the contents of this report.

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