

## **Lambeth Safer Neighbourhood Board Consultation**

### ***Lambeth CPCG Response***

#### **Overview of Response**

Lambeth CPCG considers the consultation process to be deficient. The various alternatives for the form and function of the SNB, discussed within the working group, are not presented in equal terms. This bias will favour the consultation's 'core' model – essentially MOPAC's guidelines.

CPCGs detailed response is set out on the ensuing pages. These follow from an assessment of the consultation proposals against our [Principles for Effective Engagement](#) to sustain policing by consent. These we set out almost a year ago and agreed with our membership.

#### ***Accessibility***

These proposals treat accessibility as a side issue in respect of the SNB's ways of working in terms of 'Public rights of audience'. The unfettered access for ordinary residents to walk in from the street and present their concerns to senior police officers, in a public forum, has been pivotal in building local confidence in policing. The grudging granting of limited 'audience' is no substitute. Nor can the Safer Neighbourhood Panels fulfil this role. They are restricted to addressing very local issues and are far from accessible – details of their meetings are not reliably published and it is impossible to contact the Panels directly.

Accessibility is to be further inhibited by the very limited responsibility for publicising activities and disseminating information that the consultation proposes for the SBB.

#### ***Independence and Accountability***

The SNB is presented as a vehicle for the community to hold the police (and by implication the wider Safer Lambeth Partnership) to account. This accountability is to be blunted by the fact that the overwhelming majority of 'approved' community organisations proposed to be represented on the SNB are sponsored, gate-kept or managed by either the police or the local authority. They manifestly lack independence. Accountability is best provided by transparent democratic processes, which are conspicuously absent in the majority of these organisations. In the case of the Safer Neighbourhood Panels, representation is not selected directly by the panel members themselves, but by some second tier forum.

Independence is also to be curtailed by prescription of the SNB's agenda. In respect of policing priorities, for example, the consultation restricts the SNB's remit to the types of crime dealt with by the Safer Neighbourhood Panels.

### ***Balance***

The MPS's own research has demonstrated that public confidence in policing rests on public perceptions of both the police's effectiveness and the police's fairness in carrying out their business. This balance needs to be reflected in membership and remit of the SNB. The specific exclusion of both the Independent Custody Visitors and the Stop and Search Monitoring Group highlights the extent to which these proposals address just one side of the confidence agenda.

CPCG's amendments to these proposals are the very minimum required to retain public confidence in policing in Lambeth within the framework set out by MOPAC.

### ***The Consultation Process***

CPCG is disappointed that the co-Chairs of the Lambeth Safer Neighbourhood Board Working Group were not able to show greater persistence in seeking some compromise proposal for the SNB to put to the people of Lambeth in consultation. We are also disappointed that our own proposal to bring together the very diverse communities and interests in our borough to develop proposals for the SNB in a considered, cooperative and deliberative way met with no cooperation from other stakeholders.

The consultation document itself does not present all the options discussed in the Working Group on an equivalent basis. It is therefore likely that it will bias responses to what it presents as the 'core' model (basically the MOPAC specification).

Detailed CPCG responses are set out below. For brevity we have omitted the lengthy reasoning and arguments we have already set out in papers which have previously been circulated to the Working Group and to our membership. They can be found here:

[Position Paper: Sustaining Policing by Consent in Lambeth, June 2013](#)

[Lambeth CPCG Proposals for SNB Structure and Functions, December 2013](#)

### ***Terms of Reference – Role of the SNB (page 3)***

#### Item 1

The over-arching objective of the Safer Neighbourhood Board should be to support and promote policing by consent within Lambeth and across the Metropolis. Community engagement is a means to that end.

Item 1 should therefore read -

“Lambeth Safer Neighbourhood Board is a non-statutory, voluntary association of individuals to promote and secure policing by consent in Lambeth.”

#### Item 2

This item is very specific in terms of the Safer Neighbourhood Panels but less so in borough wide groups. We know that only some of the SNPs are fully functional (in so far as there is publically available information) but accept that there is an aspirational element in setting the most local element of the Safer Neighbourhood Board (SNB) on the SNPs. Designing-in a role for as yet to be established Cluster Panels is, however, a step too far.

Item 2 should therefore read:

“The SNB will bring together communities within Lambeth to coordinate engagement for policing in Lambeth. This will rest on both the Ward level Safer Neighbourhood Panels and borough wide community groups with an interest in policing and community safety, like the CPCG, the ICVs or the Stop and Search Monitoring Group”.

#### Item 3

We would expect the SNB to be accessible and to give account to the residents and communities of Lambeth more than once a year (see below in respect of public access). If it is to be included at all, then this statement should only relate to a formal Annual Report.

Item 3 should therefore read:

The SNB is accountable to MOPAC and to the residents and communities of Lambeth for the effective and proper discharge of its functions. It shall be open and accessible in all its activities within the borough. It shall publish an annual, forward plan each year and a formal report of its activities throughout the year.

The consultation document also asks for views with regard to the Area Panels. There is value in ensuring that the SNP Chairs joining the Safer Neighbourhood Board are drawn from across the borough. It is rash however to include any role for as yet non-existent ‘Area Panels’ and they should not be incorporated into any borough wide engagement arrangements unless and until they are up and running and have proven their worth.

In our view, the SNB should first focus on ensuring that SNPs are properly functioning – that they are open, accessible and accountable within their communities – before incorporating another tier of unaccountable bodies. Meanwhile, the SNB itself should ensure that it is directly accessible to anyone who lives, works or studies in the borough. Citizens should have the right to engage with local police in the manner that best suits them, and not through some convoluted and byzantine structure.

The SNPs may meanwhile choose to trial the Area or Cluster arrangements outlined in the consultation paper. That is their choice. Our only observations would be that, should such arrangements ever to be incorporated within the SNB structure then they should adhere to the same principles of open accessibility and accountability that we have argued should run through the whole of engagement within the borough. Specifically, in no circumstance should they operate through closed or secret meetings, they should accept the same obligation for publication of papers as the SNB itself (see below) and the organising and managing the Panels should be the responsibility of the community members, not the Cluster Inspectors.

The consultation document also asks for views and feedback in respect of ensuring a bottom-up approach, ensuring the widest possible engagement with joined-up working and so forth. We make the general comment that this is best achieved by adhering to the principles set out at the head of this response. This should be reflected in both the membership of the SNB and its manner of operation.

### ***Terms of Reference – Functions of the Safer Neighbourhood Board***

#### *Function 1 - Establishing Policing Priorities.*

The suggestion is made that policing priorities for the borough should be set by bringing together the priorities already established by the Safer Neighbourhood Panels. Published information on Ward priorities is somewhat garbled, and may be out of date, (see [http://content.met.police.uk/Page/TeamFinder?scope\\_id=1257246764163](http://content.met.police.uk/Page/TeamFinder?scope_id=1257246764163) ). Nonetheless, it is clear that local SNP priorities tend to exclude the most violent crimes in the borough and also those largely in the private realm, notably violence against women and girls. To some degree, this is understandable – the panels address those issues which are in the public realm and can be dealt with by a Safer Neighbourhood Team of police. In consequence, however, restricting the borough's priorities only to those crime types identified by SNPs would fail to encompass some of the most serious crime issues facing the borough.

Moreover, as confirmed by the MPS's own research, confidence in policing rests on perceptions of both the effectiveness and the fairness of policing. Sustaining policing by consent thereby requires effective consultation and engagement around both aspects.

The qualifying statements ('bringing together priorities, regard to the Mayor's pan-London' etc) should be omitted and the Function simply stated as:

“To determine an annual set of borough priorities for policing and crime reduction, working in partnership with Lambeth MPS and the borough’s Community Safety Partnership.

*Functions 3, 6, 7, 8, 9 – Relationships with Community Groups*

These are all functions relating to groups of volunteers (respectively the Safer Neighbourhood Panels, the Independent Custody Visitors, the Independent Advisory Group, Neighbourhood Watch and the Stop and Search Monitoring Group. But these groups are dealt with very differently depending on they feed into the confidence agenda.

Some of these groups have a role is to offer legitimate monitoring and challenge to the use of police powers; they are oriented towards the Fairness side of the confidence agenda. Notably these are the ICVs, the Stop and Search Monitoring Group and the IAG. They are to be ‘overseen’ or have their functioning ‘ensured’, by the SNB. They are to be required to provide reports of their work to the SNB. The ICVs and the Stop and Search Monitoring Group are not to be given membership of the SNB but they are required to be in attendance.

In contrast, those groups who are more oriented to the Effectiveness agenda – the Safer Neighbourhood Panels or the Neighbourhood Watches are to be ‘supported. They are to be given seats on the SNB but no requirements are to be made of them in terms of performance or reporting.

This disparity in treatment and the manifest skew of community membership away from legitimate challenge around use of police powers should be rectified in by treating **all** community groups with whom the SNB has formal relationships, in the same way;

- All such groups (the Safer Neighbourhood Panels, the ICVs, the Stop and Search Monitoring Group, the IAG, the Business Crime Reduction Partnership) should be **Supported**, recognising that ‘support’ can include admonishment where performance is poor but equally can include championing and advocacy of issues brought to the SNB. The SNB has no sanction over volunteer groups whereby it can ‘ensure’ that they function and it would be presumption indeed for it to attempt to ‘oversee’ any community group.
- Members of the SNB can, however, be reasonably be required to report on their activity, which in effect legitimises their membership. Equally, all those groups who are required to report to the SNB should be members, otherwise why should they bother to turn up? Specifically, the SSMG and the ICVs should be members of the SNB.
- The SNPs, the ICVs, the SSMG, the IAG, and the Business Crime Reduction Partnership should produce clear reports, ahead of meetings, indicating:
  - The extent to which the community membership are doing what they have undertaken to (meetings held, accessibility, initiatives undertaken);
  - The extent to which the police are supporting and enabling the groups work;
  - Summary performance feedback and community concerns arising in the area of the groups remit ie Custody, Neighbourhood Policing, Business Crime, Stop and Search.

### *'Additional' Functions*

The 10 functions which the consultation paper describes as 'core' are in fact those set out by MOPAC and are mostly derived from MOPACs own statutory obligations. As such, it is highly controlled and restricted to a particular selection of the 'usual suspects'.

It for that reason that we argue that in its functions, its membership and in its mode of working the SNB needs to be responding outwards to the community as much as inwards to MOPAC: it should have the responsibility of supporting and nurturing the widest possible engagement with policing in Lambeth, especially from those who are not in any of the 'connected' groups formally recognised in the structure.

**To do that the SNB must built and maintain an up-to-date web presence (on which all its papers should be published) together with a mailing list onto which anyone can enrol themselves via the web. All papers should be distributed to the list ahead of meetings.**

### ***Terms of Reference – Membership***

We have already noted that the ICVs and the SSMG should be members of the SNB for reasons of both principle (to give due weight to the importance of fairness in policing) but also pragmatics (to give those groups an incentive to turn up).

We have already noted that the SNB needs to reach beyond the usual suspects amongst the well-connected. It is for that reason that we propose that the SNB maintains an associate membership open to anyone who lives, works or studies and also to any community organisation comprised of people who lives, work or study in the borough. There should be six seats on the Board allocated to this membership who should elect, from their number, three individuals and three representatives of community organisations. In this way the SNB has some chance of being open to new, and possibly currently marginalised, voices. We do not consider that two seats allocated to CPCG are an adequate provision for this constituency.

Given the membership already suggested in the consultation document, this increase in six members (ICVs, SSMG, a net four from associate membership) would take the total to 25. This is still consistent with the range suggested by MOPAC in their guidance. However, if it is felt that this is to large a number, then we would suggest shedding:

- The Chief Officer of the Fire Service – the interaction with crime and community safety is only marginal
- The member of the Neighbourhood Watch Association – Neighbourhood Watch is 'micro-local', below ward level. The Neighbourhood Watches should therefore feed in at the SNP level and do not require separate representation on the SNB.

### *Terms of Reference – Meetings, Governance, Ways of Working*

We are generally supportive of the proposals relating to Meetings, Governance and Ways of Working with the following exceptions.

Agendas, Minutes and papers should be circulated to the mailing list (above) and placed on the website a week ahead of the meetings and not just to 'stakeholders'.

The either/or choice presented in the consultation paper( in respect of public rights of access) is a false one and is a misunderstanding of the proposal originally made by CPCG in discussion.

The SNB should, in the first instance, adopt the model of public access implemented by the local NHS Clinical Commissioning Group and which seems to work satisfactorily for them. That is:

- An hour is allocated prior to each meeting for a public forum. There is no requirement for prior notice of questions or comments. At the start of the forum the Chair asks those present to indicate and to state whether their comment/question relates to the Agenda or is more general. Agenda related contributions are dealt with first. Responses may be commitments to follow up actions.
- At the start of the meeting proper, the Chair summarises what has transpired in the pre-meeting forum and that is minuted. During the meeting, after discussion of each item by Board members the Chair (time permitting) can ask if there are any contributions from the floor before moving to a decision on the item.

The SNB should adopt this model from the outset. If it cannot be contained within the time constraints of the meeting schedule, then the SNB should schedule separate publically accessible forums , where members of the public can address senior officers in the police and the local authority on borough wide issues. It should seek funding from the Safer Neighbourhoods Fund to do so. The facility for ordinary residents to know that they can walk in off the street and, in the company of their fellows, address the concerns to senior officials has been invaluable down the years and has done much to move us on from the circumstances of 1981. It is a need which remains today and must be preserved.

CPCG

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