



Promoting improvements
in policing to make
everyone safer

Operation Lynemouth: First interim report

HMIC inspection of the Metropolitan Police Service's review and reassessment of alleged criminal offences arising from the 2014 mayoral election in the London Borough of Tower Hamlets

June 2017

© HMIC 2017

ISBN: 978-1-78655-406-2

www.justiceinspectorates.gov.uk/hmic

Contents

1. Summary	3
2. Introduction	4
The background to this inspection	4
HMIC's terms of reference	6
Methodology	7
3. Findings	8
Governance	8
Resourcing	10
Progress towards objectives	12
4. Conclusions	17
Progress to date	17
The next quarter	17

1. Summary

In March 2017, the Mayor of London's Office for Policing and Crime (MOPAC) asked Her Majesty's Inspectorate of Constabulary (HMIC) to inspect the Metropolitan Police Service's (MPS) investigation of alleged criminal offences arising from the 2014 mayoral election in the London Borough of Tower Hamlets.

The MPS investigated these allegations at the time, and subsequent to an election court ruling that declared the result of the election void. The court found that corrupt practices prevailed at the elections of both the mayor and the councillors for the 20 wards of Tower Hamlets, which were held on 22 May 2014.

Despite the election court ruling, the police investigation did not result in any criminal convictions. Concerns were raised about the conduct of the investigation into these allegations, and connected matters. As a result, on 20 March 2017, the acting commissioner of the MPS confirmed that the force would undertake a new operation to review and reassess the allegations.

MOPAC agreed that HMIC should inspect and provide assurance of the MPS's operation. We were also to provide MOPAC with interim assurance reports on a quarterly basis, with particular regard to governance, resourcing, and progress towards objectives, and to provide a final report, identifying lessons learned and best practice for the future. In this first interim report, we include background detail to provide context; this will not be necessary in subsequent reports.

When we conducted our first inspection in May 2017, we found that the operation is very much in the first phase of construction; the good foundations that are being laid will be essential to its success.

Diamond and gold governance groups have been established, which are led by chief officers and provide strategic direction. We were pleased to find that engagement with the community and interested parties is a major element of the groups' aims and objectives. The MPS was severely criticised in this regard during the initial investigation.

A major incident room has also been established, with sensible strategies and policies. Staff are engaged in the time-consuming, though very necessary, tasks of collating, reading and cataloguing vast quantities of material. We expect to see significant investigative progress during the next quarter.

Ultimately, however, the operation will depend upon adequate resourcing. We found that 5 of the 11 detective constables who were allocated to the investigation had been temporarily redeployed to homicide investigations. While they are away, the rate of progress will be slowed.

2. Introduction

The background to this inspection

Thursday 22 May 2014 was an election day throughout the United Kingdom. There was a nationwide election for members of the European Parliament, many local authorities held council elections, and a few local authorities had mayoral elections. The London Borough of Tower Hamlets held all three.

In Tower Hamlets, there was a full council election, with all 45 seats in 20 wards contested. In the election for mayor, there were ten candidates. The mayoral election is conducted on the transferable vote system, whereby each elector has two votes and chooses a first and second preference. If, at the conclusion of that process, a candidate has received more than half of the first preference votes cast, that candidate is elected.

If no candidate has received more than half of the first preference votes, the ballot papers are re-examined. The second preference votes for candidates other than the two with the most first preference votes are then disregarded, while the second preference votes for those two are added to their first preference votes from the first round.

On 24 May 2014, the outgoing mayor, Lutfur Rahman of the Tower Hamlets First (THF) party, was re-elected after an extended count and the reallocation of second preference votes.

Mr Rahman's campaign and election were controversial. On 10 June 2014, four petitioners¹ presented a petition to have the election set aside on several grounds but, principally, the alleged commission by Lutfur Rahman (the 'first respondent'), or his agents, of corrupt and illegal practices, contrary to the Representation of the People Act 1983. The petitioners also alleged that the returning officer, John Williams (the 'second respondent'), had failed to conduct the election in accordance with electoral law and that the election should be set aside on that ground, independently of their case against Mr Rahman.

The Election Commissioner, Mr Richard Mawrey QC, presided over the election petition hearing, which began on 2 February 2015, and ran until 24 March 2015. He concluded that corrupt or illegal practices may reasonably be supposed to have affected the result of the election and declared the result void.² He also declared that

¹ The four petitioners were Andrew Erlam, Debbie Simone, Azmal Hussein and Angela Moffat.

² Judgment in the High Court of Justice, Queen's Bench Division, in the matter of the Representation of the People Act 1983 and in the matter of a Mayoral Election for the London Borough of Tower Hamlets held on 22 May 2014 (M/350/14).

Mr Rahman's agent, Alibor Choudhury, was guilty of corrupt and illegal practices, contrary to the Representation of the People Act 1983.

Before the hearing, an agreement was reached between the petitioners and the returning officer and, as a result, the petitioners' criticisms of Mr Williams were unreservedly withdrawn. The Election Commissioner believed that was the right course of action.

In delivering his judgment, Mr Mawrey QC noted that on 4 November 2014, the Secretary of State, Sir Eric Pickles, had announced the appointments of commissioners to take over some functions of the mayor and council, particularly in relation to grants. He further commented that it seemed likely that the governance of the borough would have to be examined "in the not too distant future".³

Mr Rahman has applied to the High Court for a judicial review of the findings.

Initial police investigations

The MPS investigated a total of 164⁴ allegations of electoral fraud and malpractice at the time. The investigation was conducted by the force's special enquiry team (SET) but did not result in any convictions, although one individual was charged with electoral fraud. The Crown Prosecution Service (CPS) subsequently discontinued the case on the grounds that it was not in the public interest to proceed. Two other individuals were cautioned for minor offences, while six were warned about their behaviour.

The CPS considered the evidence provided to the election petition hearing, but as neither the court nor the director of public prosecutions referred any matters to the MPS for investigation, the police did not examine the 27 files containing the court material.

However, the SET did investigate other allegations of fraud relating to the London Borough of Tower Hamlets. One of the most significant allegations concerned a £400,000 grant to a Communities, Localities and Culture (CLC) Youth Project that sought to dissuade young people from engaging in criminal activity. Again, the police investigation did not result in any charges.

On 16 March 2016, the MPS closed all investigations into these matters, as it considered there was insufficient evidence of criminal offences. This decision was published in a media statement.

³ *Ibid.*

⁴ A further five allegations have since been identified, making the total 169.

Review and reassessment

The lack of prosecutions and convictions gave rise to concern. Notably, on 12 August 2016, the Government's anti-corruption champion, Sir Eric Pickles published his report *Securing the ballot*,⁵ which levelled criticism at the MPS.

On 9 March 2017, the chairman of the London Assembly Police and Crime Committee wrote to the deputy mayor for Policing and Crime, stating that the committee was convinced that "more could have been done to investigate the very many allegations of fraud and malpractice in Tower Hamlets before and during the 2014 Mayoral Election, and that those investigations that did take place were not done to the highest possible standards".⁶ The chairman asked the deputy mayor to refer the matter to HMIC.

On 20 March 2017, the acting commissioner of the MPS wrote to the deputy mayor, outlining the force's response to the concerns which had been raised. Essentially, a new police operation would review and re-investigate all the allegations.

On 21 March 2017, the mayor of London's Office for Policing and Crime (MOPAC) asked HMIC to inspect the review and re-investigation operation.⁷ HMIC agreed to proceed, under the provisions set out in section 54(2BA) of the Police Act 1996 (inserted by section 83 of the Police Reform and Social Responsibility Act 2011).⁸

On 2 May 2017, the MPS established Operation Lynemouth as the new police operation ("the operation").

HMIC's terms of reference

Our terms of reference are:

1. To inspect and provide assurance of the Metropolitan Police Service's review and re-investigation of alleged criminal offences arising from the 2014 mayoral election in the London Borough of Tower Hamlets;
2. To further monitor developments through Metropolitan Police diamond and gold governance groups;

⁵ *Securing the ballot*, HM Government, 2016. Available from: www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud

⁶ See: www.london.gov.uk/sites/default/files/letter_from_pcc_chairman_to_dmhc_re_election_fraud.pdf

⁷ Letter from Sophie Linden, Deputy Mayor for Policing and Crime, to Matt Parr, HM Inspector of Constabulary, dated 21 March 2017.

⁸ Letter from Matt Parr, HM Inspector of Constabulary, to Sophie Linden, Deputy Mayor for Policing and Crime, dated 10 April 2017.

3. To provide MOPAC with interim assurance reports on a quarterly basis, with particular regard to resourcing, governance and progress towards objectives; and
4. To provide MOPAC with a final report, identifying lessons learned and best practice for the future.”⁹

Methodology

In accordance with HMIC’s terms of reference, we have adopted a staged approach with quarterly inspection fieldwork and interim assurance reports for MOPAC at that frequency. This will allow HMIC to monitor progress on a regular, structured basis.

The second most senior officer in charge of the investigation (known as the gold commander) provided HMIC with a briefing prior to our inspection. We have also been supplied with copies of relevant documents.

We have attended the MPS diamond (the most senior level of command in this investigation) and gold (second most senior level of command) governance group meetings and will be represented at future meetings, in accordance with our terms of reference.

On 24 April 2017, we attended a police independent advisory group meeting, where we heard concerns raised by representatives of the local community. We explained HMIC’s role.

We visited the major incident room for the investigation, where we interviewed principal members of staff. We examined various investigation documents including policies and strategies. We also had a meeting with the borough commander for Tower Hamlets.

In addition, we interviewed a senior officer from City of London Police about the role his force is to play in support of the operation.

⁹ *Ibid.*

3. Findings

For this section of our report, we have paid particular attention to point 3 in our terms of reference (interim quarterly assurance reports), and have therefore ordered our findings under three subheadings:

1. governance;
2. resourcing; and
3. progress towards objectives.

Governance

In policing, a tiered system of governance is commonly used: the gold, silver and bronze command structure. The MPS has applied this for Operation Lynemouth.

According to the College of Policing, the gold, silver and bronze structure “provides a framework for delivering a strategic, tactical and operational response to an incident or operation.”¹⁰ The model is flexible and can be applied to any type of incident or operation. Typically the gold commander is in overall command.

On occasions, the Metropolitan Police Service supplements this structure with a ‘diamond’ level of command to ensure there is more senior management of a significant operation. For Operation Lynemouth, the MPS has introduced a diamond commander as the most senior level of command. The diamond commander is an assistant commissioner. An officer of commander rank has been appointed gold commander.

The high level of seniority ascribed to these roles is commensurate with the governance requirements of Operation Lynemouth. The diamond and gold commanders each chair a governance group.

The diamond governance group

The diamond governance group has been established and plans to meet every two months. We attended the diamond group meeting on 29 March 2017. The diamond group has recorded its objectives as:

- “1. To provide senior oversight and scrutiny of the MPS response and ensure a proportionate and effective MPS response to the matters set out in paragraph (1) of the gold group strategic aims [see below].

¹⁰ For more information, see: www.app.college.police.uk/app-content/operations/command-and-control/command-structures/

2. To ensure that any policing response, reviews or subsequent criminal investigations are reasonable and proportionate, and free from any external influence.
3. To rebuild stakeholder and community confidence in the MPS response to allegations of electoral fraud and other criminal allegations relating to Tower Hamlets Local Authority.
4. To support and facilitate the HMIC review of the response to allegations of electoral fraud in Tower Hamlets that was requested by the Deputy Mayor for Policing and Crime.
5. To support gold in the appropriate resourcing of the MPS response.
6. To help identify and act upon corporate learning leading to continuous improvement in the MPS response to electoral fraud and malpractice.”

We believe these objectives, and the frequency of the meetings, to be appropriate for the operation. The diamond group meeting we attended dealt principally with matters such as the gold commander’s investigative strategy (which the diamond commander endorsed), legal issues, and communication with interested parties. These were the matters we expected to see at this stage.

The gold governance group

The gold governance group has also been established and plans to meet every month. We attended gold group meetings on 13 April 2017 and 10 May 2017. The gold group’s strategic aims (which were set by the diamond group) were:

- “1. To oversee and coordinate any investigative assessments, reviews or subsequent criminal investigations into:
 - allegations of electoral fraud and malpractice, or other criminal allegations arising from the 2014 mayoral election in Tower Hamlets; and
 - allegations of criminal offences involving Tower Hamlets Local Authority; and
 - allegations of criminal offences made against Lutfur Rahman whilst in his position as Mayor of Tower Hamlets.
2. To ensure that all of the matters referred to in paragraph (1) above are necessary and conducted in a proportionate manner.
3. To provide oversight of, and decision making for, any legal proceedings arising from the 2014 mayoral election in Tower Hamlets.

4. To rebuild stakeholder and community confidence in the MPS response to Tower Hamlets electoral fraud and other investigations into Tower Hamlets Local Authority.
5. At the conclusion of any criminal investigations and reviews, to effectively transition strategic oversight to the local policing commander and chief officer.”

We consider these strategic aims, and the frequency of the meetings, to be appropriate for the operation. The gold group meetings we attended dealt with important matters such as the management of the investigation, communication with interested parties and media handling. Sensibly, the gold commander asked for the creation of a risk register in order to focus attention on the management of some obvious risks, including resourcing problems and the potential impact of Mr Rahman’s judicial review application.

Resourcing

One of the most important responsibilities of those charged with the governance of any police operation is to ensure that the right level of resources is provided. If they do not – or cannot – do this, the operation’s likelihood of success will be reduced. In Operation Lynemouth, resourcing is the diamond group’s fifth objective.

We looked at two issues: the senior investigating officer’s assessment of what resources the operation would need, and the actual level of resources made available and deployed to the operation.

The resource requirement

In making his assessment, the senior investigating officer has taken account of the known scale of the operation, i.e. 169 allegations and 27 court files (believed to amount to 10,000 pages). There is also an unknown element to the scale of the operation: additional allegations which were not part of the electoral fraud investigation.

The senior investigating officer produced a ‘costings paper’ which included a resource requirement based on the need for “... sufficient investigative capacity to review, analyse and investigate both historic and fresh allegations”.¹¹

The resource requirement was for the use of a HOLMES-equipped¹² major incident room, with a team of 16 police officers and two police staff:

¹¹ Operation Lynemouth Costings Paper, 25 April 2017.

¹² The Home Office Large Major Enquiry System (HOLMES) is an investigation management system which is used by law enforcement agencies to investigate serious crimes.

- 1 superintendent (senior investigating officer)
- 2 inspectors
- 2 sergeants
- 11 constables
- 1 HOLMES indexer/typist (police staff)
- 1 analyst (police staff)

We consider this resource requirement, including the use of HOLMES, to be appropriate. A team of this size should be able to make adequate progress. It should be noted that, at this stage, the review process has just begun. The staffing level may need to be revised in due course, particularly when the full nature and extent of the additional allegations becomes clearer. Furthermore, specialist support such as forensic accountancy may be required as the investigation progresses.

The actual resourcing

A HOLMES-equipped major incident room was made available with the team of 18 as requested, and the officers and staff began working on the operation on 2 May 2017 (encouragingly, a matter of days after the submission of the costings paper).

However, very soon after, five of the constables were redeployed to homicide investigations.¹³ Although this means that the operation cannot progress as quickly as intended, the loss of personnel in this way is manageable, so long as it is temporary. There is unlikely to be any risk of the loss of physical evidence, but the expectations of interested parties will need attention.

There may be very significant disclosure implications under the Criminal Procedure and Investigations Act 1996 (CPIA) (as amended by the Criminal Justice Act 2003).¹⁴ A disclosure officer has not yet been appointed to the team and this function is being performed by the office manager, who is a detective sergeant. This may need to be reviewed in due course.

¹³ Between 2 April 2017 and 15 May 2017, there were 21 cases of homicide in the Metropolitan Police Service area, of which 18 were caused by stabbing. Based on the total homicide rate of 109 during 2016, this was approximately 68 percent higher than average for a six-week period.

¹⁴ Under the Act, full disclosure should be made of all material held by the prosecution that weakens its case or strengthens that of the defence. Investigators must retain material that may be relevant to an investigation and must provide detailed and proper schedules to assist a prosecutor to make an informed decision on disclosure.

The resourcing problems faced by Operation Lynemouth need to be viewed in a wider context. Nationally, there is a severe shortage of qualified detectives and other investigators,¹⁵ while the demand for the specialist investigation of certain crime types (particularly offences against vulnerable people) continues to increase.¹⁶ In the MPS, there are 15 percent fewer trained detectives than the force considers necessary.¹⁷

As Operation Lynemouth continues, its progress will be dependent on the resources that it attracts and is able to retain. The longer the operation goes on, the harder it will become to maintain the goodwill of interested parties. Furthermore, practical difficulties such as tracing witnesses or securing their attendance at court will become more likely. The MPS's original investigation has been heavily criticised, so these risks must be actively managed.

Progress towards objectives

For this aspect of our report, we have taken the 'objectives' (point 3 in our terms of reference) to mean all the strategic aims and objectives set by the diamond group. For some of these aims and objectives, the progress towards them is self-evident (e.g. objective 4: to support and facilitate the HMIC review). For others, the objectives will become more relevant to a later report (e.g. strategic aim 5: at the conclusion, the transition of strategic oversight to the local policing commander). Consequently, for this part of our first interim report we have concentrated on the matters we consider most important and relevant for now: the status of each of the various strands of the investigation; the investigative process that the Operation Lynemouth team intends to adopt; and the MPS's engagement with interested parties.

Status of each strand

The operation has been divided into four strands:

- review of 27 files from the election court;
- review of evidence in relation to electoral fraud;
- reassessment and review of other criminal allegations relating to Lutfur Rahman or the London Borough of Tower Hamlets; and

¹⁵ *PEEL: Police effectiveness 2016 – A national overview*, HMIC, March 2017, page 24. Available from: www.justiceinspectorates.gov.uk/hmic/publications/peel-police-effectiveness-2016/

¹⁶ *Ibid.*, page 18.

¹⁷ *PEEL: Police effectiveness 2016 – An inspection of the Metropolitan Police Service*, HMIC, March 2017, page 24. Available from: www.justiceinspectorates.gov.uk/hmic/publications/peel-police-effectiveness-2016-metropolitan/

- the City of London Police review of the Metropolitan Police Service's investigation into Communities, Localities and Culture (CLC) Youth Project grant funding.

Strand 1 (election court files) – work not yet started

The investigation team has not yet started work on this strand, as it does not have legal authority to access the court files. While there has been legal correspondence, a formal legal application has yet to be made for a relevant court order. The files were not examined during the original investigation, conducted by the special enquiry team (SET), since the SET was not legally entitled to do so as the MPS was not a party to the proceedings. Nor did investigators attend the hearing, although we understand that they monitored developments by reading the court transcripts of proceedings.

The CPS attended the hearing and considered the 27 files, but neither the court nor the director of public prosecutions referred any matters to the police for investigation. The CPS has agreed to conduct a joint review of the court files with the police, and has appointed counsel.

In addition to this, the oral evidence provided by witnesses at the hearing will need to be considered. While the SET may have assessed court transcripts at the time, the new investigation team will need to repeat the process to ensure that no further allegation, or anything of potential evidential value, has been overlooked.

Strand 2 (electoral fraud) – work underway

This strand is concerned with the review and reassessment of the previous investigation into what is now a total of 169 allegations arising from the 2014 election. As material is available, this strand has begun.

The SET has provided the new investigation team with 30 boxes of documents, which purportedly relate to the initial investigation. However, upon initial examination, only six boxes appeared to contain relevant material. Nevertheless, the team will catalogue all the material and look for any links to Tower Hamlets.

A further challenge has been presented by the SET's apparent failure to record the rationale for its decisions during the original investigation. For example, in the material examined thus far, records do not indicate why allegations were marked 'no further action', although the reasons for this may become obvious in time.

The Operation Lynemouth team aims to complete this review and reassessment during the next quarter.

Strand 3 (other criminal allegations) – work not yet started

This strand, which has not yet begun, concerns the review and reassessment of other criminal allegations which do not fall into the categories of the previous two strands. Typically, the allegations will include bribery, perjury, mortgage fraud and tax evasion.

This strand is very broad and the senior investigating officer (SIO) will need to set some investigative parameters in order to ensure that the operation remains reasonable and proportionate (objective 5).

Strand 4 (Youth Project grant funding) – work underway

This strand, a review of a fraud investigation, is being undertaken by City of London Police, in recognition of that force's expertise in investigating fraud. It relates to the award of a £400,000 grant. It is a matter of public concern that the previous investigation concluded that no criminal offences had been committed.

HMIC has discussed the case with the City of London Police commander who is overseeing his force's involvement.

The investigation process

We were encouraged to find that the senior investigating officer has created a clear, logical process for the handling of all the material. In the first instance, each strand is concerned with the review and reassessment of the material, with the objective of identifying any further lines of enquiry and evidential opportunities.

A range of relevant strategies and policies have been introduced to guide how the material is to be catalogued and assessed on the HOLMES computer database. Reporting and assurance measures have been introduced. This process is currently being applied to the 169 allegations (strand 2) and it will be applied to other strands in due course.

Master schedule of allegations

As the process of collating and cataloguing relevant material continues, the team has begun to build a 'master schedule' of all the allegations, which they will use with the CPS and counsel to assess the evidence in its totality. The assessment will consider a broader range of offences which will include, but not be limited to, offences of conspiracy (contrary to the Criminal Law Act 1977) and misconduct in public office (contrary to common law).

Reporting process and two-stage assurance for each allegation

The strand 2 allegations will be considered individually and a review report will be produced for each one, resulting in a total of 169 reports. In the first instance, a detective constable, as review officer, will consider the evidence and start a report

which will identify further potential lines of enquiry and relevant actions.¹⁸ The report will then be passed to a detective sergeant, as review supervisor, who will review the actions identified and consider any links to other offences. The review officer will submit details to the analyst, who will look for crime patterns.

Each review report will also be examined by a detective inspector, as investigating officer, thus providing a second stage of assurance. All reports will eventually enter the major incident room system, although those with relevant lines of enquiry will be 'fast-tracked'. Any actions then generated by the system will be allocated to the original review officer for completion.

We are satisfied that – so long as it is adhered to – this reporting and two-stage assurance process will provide a sound basis for the investigations that will follow.

Crime recording

We found that, of the 164 allegations which were originally investigated, only 20 had been recorded on the force's crime reporting information system (CRIS). Several of the allegations did not relate to criminal offences but the diamond commander will wish to make certain that the force has complied with the national crime recording standard (NCRS) when recording allegations of criminal offences.¹⁹

Further independent review

When the acting commissioner of the MPS outlined his proposals to the deputy mayor for policing and crime on 20 March 2017,²⁰ he stated that an external force was to be commissioned to conduct an independent review of the operation in three months' time.

In general terms, HMIC is supportive of such an approach. However, in the case of Operation Lynemouth, it appears to us that this further layer of external assurance may be unnecessary at the three-month stage (August 2017). Instead, the question of an external review should be considered by the diamond and gold commanders when the four strands are nearer to completion.

¹⁸ An action is any activity which, if pursued, is likely to establish significant facts, preserve material or lead to the resolution of the investigation.

¹⁹ The National Crime Recording Standard (NCRS) promotes consistency between police forces in recording crime. The College of Policing provides appropriate guidance in its Authorised Professional Practice for Information Management.

²⁰ Letter from the Acting Commissioner to the Deputy Mayor, dated 20 March 2017.

Engagement with interested parties

In his letter of 9 March 2017,²¹ the chairman of the London Assembly Police and Crime Committee remarked that “[t]he relationship between the Met and the Petitioners ha[d] been unsatisfactory” and that there had been “a lack of positive engagement and a failure to communicate effectively”. HMIC wanted to see that the police had taken steps not only to address these concerns but also to engage with the wider community.

Public confidence is a key component of the governance groups’ aims and objectives. At the gold meeting we attended on 10 May 2017, the gold commander reiterated that the operation comprises two main elements: investigation and engagement.

Translating this into practice, the force is engaging with interested parties. The gold commander has written to the petitioners and other interested parties (16 in total) outlining the force’s proposals and offering an opportunity to meet and discuss matters. He chaired a police independent advisory group meeting which we attended on 24 April 2017, and has held meetings with two local Members of Parliament.

A media strategy has also been prepared, which is reviewed at gold meetings. The borough commander, who is in daily contact with the local community, attends the gold meetings and is well placed to advise on public perception and opinion.

At this stage, we consider the MPS is taking adequate steps to engage with interested parties and communicate effectively.

²¹ See:

www.london.gov.uk/sites/default/files/letter_from_pcc_chairman_to_dmhc_re_election_fraud.pdf

4. Conclusions

In conducting our quarterly inspections, we shall consider the progress that has been made to date and the progress that we would anticipate during the following period.

Progress to date

Progress to date is encouraging. Diamond and gold governance groups have been established, which are led by chief officers and provide strategic direction. Public confidence is a key component of the governance groups' aims and objectives and we were pleased to find that the force is engaging with interested parties.

The investigative work is at an early stage but a major incident room has been established, with appropriate strategies and policies. Staff are engaged in the time-consuming, though very necessary, tasks of collating, reading and cataloguing vast quantities of material.

City of London Police has been commissioned to review one of the strands of the operation (strand 4), which relates to the MPS's previous investigation into grant funding.

The next quarter

By the time of our second interim inspection, we anticipate that significant progress will have been made, particularly in respect of the areas below.

- **Risk register:** the proposed risk register should be introduced and monitored thereafter through governance groups.
- **Master schedule of allegations:** the master schedule of all allegations should be completed.
- **Investigative parameters:** parameters should be set to ensure that any investigations are reasonable and proportionate.
- **Crime recording:** senior officers must ensure that all allegations are appropriately recorded and that the force complies with the national crime recording standard (NCRS).
- **Strand 1 (review of 27 files from the election court):** application should be made to the court for authority to access relevant files, in preparation for the review process.
- **Strand 2 (review and reassessment of a previous investigation into electoral fraud):** this strand should be completed.

- **Strand 3 (other criminal allegations relating to Lutfur Rahman or Tower Hamlets):** all relevant material (including that held by third parties) should be collated in preparation for the review process.
- **Strand 4 (City of London Police review of the previous investigation into grant funding):** this strand should be completed.