Risk Management Update – Strategic Risks

1. **PURPOSE OF REPORT**

1.1 To provide members of the committee with oversight of the strategic risks for the Chief Constable.

2. **BACKGROUND**

2.1 With risk maturity, understanding and confidence improving in West Midlands Police, the Risk Team have introduced strategic risk as a governance level in addition to corporate and departmental.

2.2 Strategic risks represent our potentially longer-term chronic risks and may have larger and more widespread impacts for the force and our ability to achieve strategic objectives.

3 **CURRENT OPEN STRATEGIC RISKS**

FUNDING GRANTS	MEDIUM

Ceasing or shortfalls in grant funding would mean that force would need to source funding from the core WMP budget or the activity in the area(s) may need to reduce or cease.

This is a force strategic risk for all grants – please refer to tracker attached in documents.

If values are agreed for the current year the risk remains for future years and each grant may have caveats in relation to the funding which we will need to work through on a case by case basis.

3.1. Tracker kept by finance to monitor any grants and funding required inclusive of unbudgeted grants. This is shared with the risk team and updates are provided quarterly throughout the year.

3.2. Known movements for next year and any grants that we've received funding confirmation for in 2025-26 are monitored through the tracker.

3.3. The current grant at risk is the County Lines and we are looking to mitigate this by putting several staff on permanent contracts before funding potentially ends next March.

MISINFORMATION, DISINFORMATION OR NON-FACTUAL REPORTING WITHIN THE MEDIA AND SOCIAL MEDIA	MEDIUM
There is a risk of our communities trust and confidence in WMP being negatively impacted, heightened community tensions and potential social disruption (i.e. protests) fuelled by misinformation/disinformation. There is a further risk that comments left under such posts can fuel the spread of misinformation/disinformation. Comments may also constitute a criminal offence (i.e. racist) or should be challenged by the force – allowing posts to remain may then further negatively impact trust and confidence in WMP.	

3.4. Corporate communications would have access to the III team in intel to be able to authenticate whether an image/video is fake and where a post has come from in the world so we can help mitigate any speculation/backlash with some clear facts.

3.5. This can be done within minutes by the III team and puts us in the best position to be able to address this issue. This would mean we are able to respond with authority quickly.

3.6. Scoring assessment to be reviewed with owner in light of the mitigation and controls in place.

COMMUNITY TENSIONS AND POLITICS	LOW
There is a risk of increased public protest and unrest, increased community tensions, reduced perception of public safety and impact on public trust and confidence in policing response to the highly sensitive and politicised events. There is a risk of increased demand on policing - changes in criminality, targeting of vulnerable groups and impact on hate crimes/incidents and safety, wellbeing and welfare of staff may be impacted.	

3.7. Initially created under Operation Biotas in response to the summer riots of 2024. Significant work was completed for Op Biotas, with identified organisational learning captured.

3.8. When the tensions of the summer riots subsided, the risk context and description have been amended to reflect and capture wider current and future community tensions.

3.9. Current concerns focus on Op Slater (anti-migrant tension) and Palestine-Israel conflict.

NET ZERO AMBITION	MEDIUM
Risk that WMP is unable to achieve Net Zero 2035 in line with its publicly stated ambitions, due to the capital investment requirements and in particular the cost of heat decarbonisation and building fabric improvements. The accelerated deployment of energy reduction projects and low carbon technologies required to achieve this ambition will also need dedicated resources and governance arrangements which are not currently in place. *Whilst there are no current requirements for the public sector in England to report progress in reducing greenhouse gas emissions it is anticipated that this will change with Government mandating reporting in the future in order to ensure national targets are met.*	

3.10. Fleet decarbonisation work continues with a planned electric vehicle (EV) transition workshop to take place with attendees and examples of vehicles to ensure good feedback.

3.11. Cenex have progressed work in relation to vehicle telemetry data on use, dwell times, speed, mileages etc to assess charging requirements at various locations, vehicle use, and capacity needed to inform the strategy.

3.12. Additional options are being explored locally and nationally for potential sources of funding for installation of EV changing points.

3.13. More emissions data is now being collected to understand the full impact of operations and further potential areas for work to achieve carbon savings.

3.14. Updated costing being sought for the remaining top 10 consuming sites for LED lighting and solar PV.

3.15. Work has begun on developing a staff travel plan with a view to running a staff survey to understand commuting habits and factors influencing change where there is single occupancy car use. These emissions form part of our Scope 3 reported emissions which we have not currently reported on.

3.16. Building sustainability and environmental requirements into future contract tenders to ensure contractors live our ambition to decarbonise and assist in collecting emissions data they produce in fulfilling our contracts. These form part of our Scope 3 emissions that we currently don't collect data or report on. This will enable us to work with our contractors to work to reduce these areas.

INTERNAL ELECTIC VEHICLE (EV) INFRASTRUCTURE AND ULTRA LOW EMISSION VEHICLE (ULEV) STRATEGY FOR FUTURE FLEET TRANSITION	MEDIUM

Phase out internal combustion engine (ICE) vehicles by 2035 and shift to EVs presents a risk for our fleet management strategy, as the current fleet consists of 1884 vehicles of which 80 are full EVs.

Presently, the infrastructure to support an all-EV fleet internally is inadequate.

The market for Ultra Low Emission Vehicles (ULEVs) will include options beyond just electric vehicles, including hydrogen and other alternatives, we cannot assume that the EV infrastructure will be the sole future solution for fleet needs.

3.17. To address this challenge, we have commissioned a consultant to assess our estate and fleet composition. This consultancy will provide critical insights into the infrastructure needed to support a transition to net-zero emissions for our fleet.

3.18. Conclusion of current decarbonisation consultation is expected in Oct - Dec 25 when risk will be better understood.

3.19. Linked to Net Zero Strategic ambition and update as above.

FRAUD INVESTIGATION AND PREVENTION	MEDIUM

There is a risk that WMP may have insufficient governance, oversight and performance arrangements over fraud. Additionally, there is a concern that WMP may not be doing enough to support victims in preventing fraud, including providing effective advice to its communities.

3.20. Fraud is managed under PEEL Assessment Framework 25-27 and governed by ACC Parnell through a monthly meeting.

3.21. The dedicated Economic Crime Unit (ECU) receives a number of intelligence documents from City of London national leads where trends, issues and patterns are identified. This is also supported by information from Action Fraud. This provides a national and regional understanding of the threats that are likely to impact our local communities.

3.22. The force has a dedicated Economic Crime Unit (ECU) with specialist trained officers to deal with our response fraud investigations.

3.23. Fraud forms part of Major Crime Unit (MCU) Service Improvement Meeting (SIM) and through the ECU, analyst is reviewed at all levels from volume, allocation and outcomes.

3.24. Fraud are non-crimes, however we still apply the `Vanguard` principles of investigation plans, 28 and 90 day reviews.

3.25. Fraud is briefed at force performance day to the DCC and through MCU Quarterly Performance Reviews

3.26. To ensure governance and progression at a local level, MCU Prepare Team are developing a monthly slide deck for Local Policing Area SIM documents. LPAs are nominating single points of contacts (SPOCs) for fraud who will be trained on the ECCAs foundation course and included in ECU training days.

3.27. Victim Service Assessment (VSA) internal audits have been agreed to ensure we dip sample fraud reports and review the tier process.

3.28. Furthermore, the risk is being reviewed in line with governance arrangements.

END TO END ENCRYPTION	MEDIUM

WMP may not have the capability, ability or technology to intercept or access data sent via End-to-End-Encryption. This may present risks to our investigations and evidence build to secure prosecutions and outcomes for offences which may include terrorism, serious organised crime and CSEA.

This may also present a risk to our ability to intercept communications and data to prevent offences and incidents from occurring.

3.29. Approach to risk and its management to be discussed in September Senior Leadership meeting with IT & Digital.

ARTIFICAL INTELLIGENCE	MEDIUM

AI creation of increasingly convincing disinformation, deepfakes and generated content (i.e. fraud, CSEA material)
Legal challenges in relation to accountability for any harm caused by AI systems either by generated content or bias/outputs.
Over reliance on AI, impact on core service delivery should we become dependent on AI to complete tasks.
AI producing biased or harmful outputs, as well as unfair decisions being made supported by AI
AI outputs can be skewed by 'data poisoning', where incorrect entries are included in data sets which trains the AI to produce inaccurate outputs, this can also be harnessed by malicious actors through cyber-attacks.
Rapid developments in AI capability which could see safety systems and security measures unable to maintain the same pace in terms of cyber-attacks or the ability of our technology to investigate AI related offences
Skillsets of officers and staff in AI - harnessing its use in WMP, our ability to investigate offences and our trainers to upskill colleagues

3.30. There is increasing interest in using Artificial Intelligence to support a variety of operational areas across policing. These technologies come with significant risks - such as bias, lack of transparency, and privacy concerns - which need to be carefully managed.

3.31. All new AI technologies are fully assessed and only deployed in line with data protection legislation, ethical standards, operational needs and formal sign off by the SIRO.

3.32. IT&D are creating a framework to identify risks with AI tools and putting in place safeguards to mitigate them before adoption.

3.33. To ensure a planned and managed approach to AI, we will ensure that the following are also in place:

- Governance and Accountability - Clear ownership of AI systems, establishing oversight through the ethics panel and a relevant governance board.
- Bias & Fairness - in house developments and third parties' suppliers will be required to evidence fairness testing and conduct audits on outputs to identify potential bias (for any AI solution used to assist operational decision making).
- Data Protection & Privacy - Data Protection Impact Assessments (DPIA's), embedding privacy-by-design and data minimisation principles.

RELIANCE ON GLOBAL SUPPLY CHAINS	LOW
Supply shortages due to unexpected disruptions which may impact or cease essential services. *Cost increases and inflation in prices* *Potential use of supply chains with unethical practices such as exploitation and environmental degradation in order to maintain supply and essential services*	

3.34. Questionnaires issued to our suppliers which include questions around supply chains with countries affected by war etc as well as any foreseen disruption.

3.35. Blue Light Commercial send updates in around any potential supply chain/supplier issues.

3.36. Governance to manage and monitor risk through Senior Leadership Team meetings, finance governance board, commercial governance board and SCRAB meeting.

3.37. No current issues being reported, will continue to be monitored

POLICE POWERS- DISPROPORTIONALITY	MEDIUM
Disproportionate use of police powers, such as stop and search, strip searches and use of force, contribute to the ongoing perception that not all communities are treated fairly. *Sense of discrimination and bias felt by some Black, Asian and minority ethnic communities undermines the legitimacy, trust and confidence in policing* *Adultification bias where children from Black, Asian and minority ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children.* *Complaints of discrimination being handled effectively first time in accordance with the revised IOPC guidelines.*	

3.38. The use of police powers and disproportionality is managed under PEEL Assessment Framework 25-27 and governed by ACC O'Hara through a monthly meeting.

3.39. An updated stop and search learning package has been created.

3.40. The use of Body Worn Video during a stop and search / use of force is explicit in both policies. BWV footage is then used for reviews by scrutiny panels, supervisors and LPA / Dept leads.

3.41. Compliance for BWV use currently stands at 97.8% for stop and search and 94.3% for Use of Force.

3.42. At a recent Stop & Search/Use of Force Commission it was noted that BWV had been used in 100% of searches involving children.

3.43. BWV is now retained for 12 months rather than 12 weeks, enhancing the transparency and trust within the scrutiny process. A key focus in the training is the recording of officer's interactions with the public and the opportunity for feedback to be provided via the receipt and QR Code.

3.44. Performance Day action in July to improve the recording of Ethnicity, Gender and Sex across all police systems. 3-month return to report back to Performance Day in October. The recording of ethnicity data in Stop and Search and Use of Force remains strong.

CRIMINAL JUSTICE STRAIN	MEDIUM

The consequences of the current criminal justice system strain may have, having a potential negative impact on the force in terms of performance, offender management, securing justice, outcomes as well as dissatisfaction, trust and confidence and our service to the public.

THIS IS NATIONAL RISK/ISSUE*

3.45. The most visible impact of the delays in the court system is twofold.

3.46. Firstly, cases are remaining in the system longer, increasing the demand on the Witness Care Unit. Plans are in place to flex CJS staffing to realign the resource required to meet this demand.

3.47. Secondly, more witnesses are likely to disengage with the court process where there are significant delays with the matter being brought to trial. Where this occurs, there is a subsequent and associated impact on conviction rates achieved by WMP.

3.48. Receipts into CPS continue to rise, increasing demand in the system further still. Plans progressing to increase staffing in the Witness Care Unit continues.

4   RECOMMENDATIONS

4.1   The Committee to note the contents of the report and any associated appendices.

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