



Police and Crime Plan Priority: Business Crime

Title: Business Crime

Presented by: ACC Drover and Supt Robson

Purpose of Paper

1. This paper will provide an updated position for a number of individual commitments as set out in the Business Crime section within the Police and Crime Plan 2021 – 2025. There are seven commitments that are currently rag rated as green.

Delivery Plan Business and Retail Crime Commitments, with associated Key Lines of Enquiry:

2. **WMP to attend violent retail crime incidents and target offenders and for neighbourhood officers to support engagement with Business Crime Reduction Partnerships and Business Improvement Districts, to increase reporting and improve intelligence sharing.**
 - **Are WMP attending all violent Retail crime incidents they are called via 999 to attend? If not, what prevents this?**
- 2.1 WMP grade all 999 calls based on threat, risk and harm using the THRIVE model (threat, harm, risk, investigation, vulnerability and engagement). When a call is received it will be graded using THRIVE. There are 4 categories of response, and – Emergency (arrive within 15 minutes), Priority (arrive within 60 mins), Scheduled (an appointment made) and Contact Resolution (where it will be dealt with at the first point of call, usually over the phone). Last month WMP attended 99.6% of all 999 calls an Emergency or Priority. It is extremely difficult to pick out the number of violent retail crime incidents that WMP attended – however it will be pretty much in line with the total of 99.6%.
- 2.2 The grading and response times for the violent retail crime incidents are likely to be different in different circumstances. So for example, an Emergency Response would be when an offender is still present, there is serious injury or a risk to life. Priority would be within 60 mins and would be where the offender is still present but does not present a risk, or where evidence would be lost by not attending. A Scheduled response could be made where the offender has left, the IP has been safeguarded

and where an investigation is not time critical. So WMP are attending (99.6%) of violent retail crime incidents – but the response may look very different depending on the circumstances. Some incidents will get a response within 15 minutes and others may get an appointment with a neighbourhood officer in the days following the incident.

- **Retail crime is under-reported. Why is this do you think? How can we encourage Retailers to report all violent retail crime incidents and shop thefts?**

2.4 Different retailers have different internal policies around reporting, and all have different thresholds, some retailers and businesses will report everything to police, others will have a threshold set. Historically there has also been a perceived lack of action from police which may have prompted a ‘why bother’ approach from store staff – this is particularly relevant for smaller independent businesses who do not have large loss prevention teams.

2.5 Retailers can be encouraged by showing evidence of positive police action and positive outcomes, whilst working with retailers to simplify reporting processes. This is something that WMP are striving to do in conjunction with the OPCC through retailer workshops and round table events.

- **How effectively are your Neighbourhood Officers engaging with Business Crime Reduction Partnerships and Business Improvement Districts? What impact are abstractions having on Neighbourhood Officers ability to build and sustain effective engagement?**

2.6 Experience across the West Midlands shows that engagement with different BID is very good and there are lots of examples of strong BID’s across the force area working in partnership on a daily basis with Neighbourhood Teams. These are local, independent, not-for-profit, business-led action groups, so there is no single owner; rather, each local BCRP is owned and governed by its member businesses and local stakeholder.

2.7 Now that WMP has introduced Dedicated Neighbourhood Officers they are the staff who most effectively engage with BID’s and BCRP’s, therefore the impact of abstractions is minimised as they are building up and strengthening some excellent working partnerships. Some of our LPAs have dedicated retail crime officers – and on those LPA’s engagement is also extremely effective (e.g. Birmingham, Sandwell, Walsall), and there is limited impact in terms of abstractions. All LPAs are aware of, and use civil orders, particularly the use of CBO’s following conviction.

3. Innovative facial recognition technology will help combat violent retail crime.

- **How is Innovative facial recognition technology being used across WMP to help combat violent retail crime?**
- **In your view, are there any accuracy and ethical concerns about its use?**

3.1 There are two parts to this – retailer’s own systems and police facial recognition from PND.

- 3.2 In terms of police facial recognition, it can be used to potentially identify an unknown suspect if there is a suitable photo of them. This could come from CCTV opportunities, an image of a fleeing suspect captured on a ring doorbell or vehicle dash cam, or from footage taken at the scene from a witness on their mobile phone. Investigating officers submit the information to WMP Intelligence department who will complete the search and respond back to officers with result. The image will be checked against information held on the Police National Database (PND) to see if there is a match. As the PND allows intelligence from all 43 forces to be shared this option is particularly useful if the suspect may have committed other offences elsewhere in the country. WMP are shown to be the highest force in the country for use of facial ID in this way (retrospective facial ID). There are no plans for WMP to use live facial recognition.
- 3.3 It's important to note that the records held on the PND are for intelligence purposes and so cannot be used for evidence in proceedings. Although data from the PND may refer to actual physical evidence held by local police forces which can then help to identify a suspect. Specifically in terms of addressing violent retail crime, as part of their investigation's officers are encouraged and assisted to use PND facial recognition when they have an image of a suspect. This is done through the Business Crime SPOC's based on each LPA. These officers are the business / retail crime leads on their geographical area and are there to assist / encourage and share best practice on their LPA. Where officers have had success with violent retail crime using facial recognition it is shared across the network of SPOC's. As positive results are seen it encourages officers to continue / start using facial recognition.
- 3.4 In broad terms across all WMP investigations facial recognition is now regarded as a must do piece of work where there is an image of a suspect available.
- 3.5 In terms of retailers they have their own systems, and they have proved most beneficial from an intervention point of view inside the stores. However, with regards to accuracy and ethical concerns there have been some misidentifications by retailer systems. This is why human confirmation and verification is vital. Retailers also need to ensure that they have policies and processes in place to deal with activations from in store systems.
- 3.6 A good example of facial ID by retailers in the WMP force area is Mid Counties COOP who about to trial facial recognition in 3 of their busiest stores in Walsall. In order to prevent the misidentification, they will only use their own database of offenders and not share other retailer images. This is a pilot project, which COOP are keen to work in collaboration to develop. Walsall SLT are engaging, and results will be reported in the coming months.
- 4. Work with venues and licensed premises to prevent and tackle alcohol and drug fuelled violence and anti-social behaviour.**
- **What work is currently being undertaken by the Force with venues and licensed premises to prevent and tackle alcohol and drug fuelled violence and anti-social behaviour?**
 - **Is this enough?**
 - **What else would you like to do if resources allowed?**
- 4.1 DCC Green is the NPCC lead for 'Alcohol Licensing and Harm Reduction'. Under his leadership, there has been a significant drive to professionalise the role of Police

Alcohol Licensing Officer (PALO) which has included an approved level 4 NVQ qualification.

4.2 The college of policing lists the following key responsibilities for PALOs -

- Assessing and processing licensing applications and notices against relevant licensing legislation and licensing objectives to prevent and reduce crime and associated demand and initiating criminal justice proceedings.
- Conducting structured visits at licensed premises and managing hotspots to ensure adherence to licensing legislation.
- Responding to incidents and complaints that breach licensing legislation or fail to support one or more licensing objective to reduce crime and uphold public safety.
- Providing advice and/or evidence to restrict operation or close a licensed premises in an emergency to minimise the impact and risk of harm to police officers and members of the public.
- Maintaining comprehensive, accurate records of activities and outcomes and produce reports as required to support decision making and analysis of lessons learned.
- Contributing to investigations by gathering evidence and building casefiles for prosecution or representation at tribunals and court hearings to ensure accurate evidence is submitted and investigations can proceed promptly and effectively.
- Supporting colleagues within the force and key partners by providing specialist and tactical advice for all licensing matters (excluding firearms) to share knowledge, lessons learnt and good practice.
- Developing and building relationships with key stakeholders to promote compliance and, where necessary, joint enforcement activities and events to uphold licensing and gambling objectives.
- Providing a force licensing input at problem solving groups and forums to resolve issues identified and share good practice.
- Engaging in local partnership schemes and consultations related to licensing matters to contribute to force effectiveness in preventing crime.
- Engaging in wider policing activities that impact on the licensing of premises, for example, counter terrorism considerations to minimise risk of harm.

4.3 The above responsibilities are carried out by all PALOs across the force, there is currently 1 Sgt, 2 PCs and 12 police staff (some part time) across all LPAs and link in with their relevant councils to make licensed premises safer.

4.4 The vast majority of work completed will be split between two headers

- Assessing new applications and negotiating with solicitors
- Enforcement work following incidents, which could range from minor issues like not having accurate training records, right up to murders within licensed premises and serious breaches of licence.

- **Is this enough?**

- 4.5 PALOs across the force work hard to provide a specialist response to all licensing statutory duties, acting as a responsible authority under the Licensing Act 2003. There has been a significant uplift in information and skills sharing across different forces which is better equipping PALOs to deal with constantly evolving challenges from the licensing sector.
- 4.6 The new Govt are currently progressing a licensing sprint and plans to consider reform of licensing legislation. These reforms, of which DCC Green is fully engaged with, form part of a desire to encourage business growth and may lead to an increase in workload for PALOs and councils across the country, as well as policing in more general terms if there are concessions made during this reform. PALOs will need to spend considerable time assessing some of these challenges locally to ensure that sufficient control measures remain in place specifically around NTE zones.
- 4.7 Another key part of what we do is to work with Corp Comms to highlight the work that is being undertaken and give people confidence to use the NTE.

- **What else would you like to do if resources allowed?**

- 4.8 If resources allowed a greater number of proactive visits, compliance checks and enforcement at licensed premises. This would be intel driven and would focus on those generating the most calls for service. Whilst we do this in a limited capacity now, we could achieve greater compliance by being more visible during core trading hours and completing more compliance visits.
- 4.9 levels currently don't permit this to be done as much as we would want to due to capacity levels during core office hours when the bulk of the statutory work is completed.
- 4.10 BH LPA Partnerships have recently submitted a bid for funding as part of a plan to reduce SYV in the NTE with the following tactics –

4.11 Licensing Compliance Visits

To look at a multi-agency response to compliance checks at licensed premises. This will be a combination of BCC Licensing enforcement team working with WMP licensing officers and uniformed resources to give them the confidence to operate in a busy NTE location safely and conduct detailed and intrusive compliance checks around premises licence conditions.

4.12 SIA compliance visit

The local SIA enforcement team will deploy with WMP licensing officers to do a large-scale compliance check of SIA staff deployed in the NTE zone. They will do real time checks to look at the validity and history of licences ensuring a professional and accredited workforce. Previous deployments have seen over 120 SIA operatives engaged with in a night, and various minor issues tackled with the operative or the security provider. This gives venues confidence that they are paying for competent and capable SIA staff.

4.13 Licensing and gang spotting operation

To look at a multi-team response to compliance checks at licensed premises. This will be a combination of WMP Licensing team working with WMP gang spotters to target venues where we know gang nominals are likely to attend. This would be to ensure compliance around searching of key nominals and intel gathering around

groups that may be associating. If gang nominals are refusing to be searched and walk away from the premises this may justify grounds for search powers to be used.

5. Reduce business crime, including burglary, robbery, and shop theft.

- Are you satisfied with progress with this?

Performance:

	2023/2024	2024/2025	
Total Crime			
Business / Community Burglary	5307	4748	-10.5%
Business Robbery	1027	1005	-2.1%
ShopTheft	24318	32720	+34.6%
Positive Outcomes			
Business / Community Burglary	397 (7.5%)	505 (10.6%)	+3.1%
Business Robbery	317 (30.9%)	329 (32.7%)	+1.8%
ShopTheft	3410 (14%)	7534 (23%)	+9%

- 5.1 As can be seen above there have been reductions in business burglary and robbery, but significant increases in shop theft, in line with national trends.

Overall, WMP are not satisfied with these levels of shop theft. We have worked hard to address under-reporting from retailers and improve process and relationships. This has undoubtedly increased reporting around shop theft. However, there has been a 10.4% reduction in Q2 this year, compared to Q2 last year. What is also encouraging is the 9% increase in positive outcomes.

- What are the barriers to reducing it further and faster?
- What else would you like to be able to do to address this?

- 5.2 More robust sentencing from CJ and the Courts would assist with reductions, however, poor sentencing outcomes does very much hinder this.

- 5.3 From a retailer point of view becoming more efficient at reporting incidents / producing CCTC and other evidence more quickly would assist WMP in their investigations. This is work that is being progressed through workshops in conjunction with OPCC.

- 5.4 Holistic pathways, we need more initiatives like O2R, to work together with councils and other agencies, to focus on the root cause, especially when it comes to prolific offenders. But also, we need to focus on the low-level offenders, those starting out, the ones that made a mistake – to prevent them from becoming prolific offenders. For example, the Causeway programme in Walsall that ran as a pilot for could really work, but again, it costs money and is not all down to police – a partnership approach is required for long term solutions.

6. WMP to introduce targeted town centre patrols in high-risk areas.

- **What have you learnt from the Safer Summer Streets Initiative (SSSI) and ASB Hotspot delivery?**

6.1 Background in brief:

- Home Office Safer Streets Summer Initiative 2025 (SSSI)
- Three months of measured activity (July/Aug/Sept).
- Initiative Commenced on the 1st July and concluded 30th Sept.
- WMP submitted 28 plans for various Town Centres and High Streets.
- WMP town centres and high streets were selected by the Home Office. (Birmingham City centre was not included).
- Outcome Submissions were sent to the Home Office on 15th of (Aug/Sept /Oct).
- We have submitted two months full data so far, as below.

Area Measured	July	August
Total arrests Retail Crime	149	120
Total Outcomes Retail Crime	157	154
Total Arrests Street Crime	46	33
Total Outcomes Street Crime	29	21
Total Outcomes ASB	155	81

- All activity was monitored fortnightly, where plans were checked and good practice shared.
- OPCC Team have been present throughout and attended every meeting.
- Arrests for retail and street crime are monitored.
- Outcomes for retail crime, street crime and ASB were also monitored.
- Local Insights activity was also monitored, capturing community and business engagement and any innovation or good practice.
- Corporate Comms supported the initiative throughout.

6.2 Learning that has been captured from various partners involved in the SSSI:

- The increased links and fortification between policing and partnerships has proven to be positive and encouraged very effective cooperation. It has encouraged coordinated recording across organisations.
- Community safety officers have built relationships with key businesses / community / individuals & implemented radio systems / a business watch system.
- Although this is an integral part of BAU for local policing and CSP's this initiative has provided a concentrated focus on specific areas that may not have otherwise happened. It has permitted an increased concentration on activities and areas the public are most concerned by and prioritise. The initiative has also provided consistency across all 7 policing areas.
- The initiative has generated a real sense of pride and focus during a high-demand summer period and helped highlight activity that is sometimes ignored as daily business or smaller pieces of work to frontline practitioners.
- SSSI has prevented resources from being absorbed entirely into BAU, instead giving a clear priority and visibility to Safer Streets activity. The intelligence-led tasking has allowed resources to be placed where they are most needed and having a dedicated team of officers specifically for the safer streets summer initiative allowed us to focus their time and attention solely on this purpose to deliver our activities and engagement efficiently and effectively.

- This highlighted the gaps in provision across the force areas creating opportunity to provide additional support and resource in the areas. We saw more ASB offices out engaging young people, more detached youth work across the force areas.
- A focus on a local process that was then collated centrally was highly advantageous in gaining a community, local return. This bottom-up approach allowed for a greater breadth of work to be included and understood that accurately depicted what practitioners were doing on the ground. This added much needed context around the purely quantitative data.
- Regular SSSI Delivery Team online check-in meetings (LPA SPOC, LA SPOC, OPCC leads, WMP Head of Comms – Chaired by WMP SSSI Force Lead) enabled the sharing of best practice and ‘what works’ – raising awareness and enabling this to be incorporated into future delivery across WMP areas - improving practice and impact.

- **How can the learning from the Safer Summer Streets Initiative be incorporated into WMP’s ongoing delivery and approach to town centres?**

6.3 The Safer Streets Summer Initiative will be subject of a ‘formal debrief’. This will be an opportunity for all the learning to be captured and shared across LPA’s and CSP’s.

- From the ‘Local Insights Data’ the debrief will identify all the tactics that have been deployed including joint agency stakeholder investment. All positive outputs will be collected and community perception understood through the ongoing Media and Comms plan. The debrief will also identify a range of learning opportunities for the Police and CSP.
- Across the force there are a range of governance arrangements in place, both formal and informal to ensure that the learning from that review is effectively re-invested into day to day policing.
- At Force Executive level the ACC for local policing chairs a monthly Local Policing Governance meeting where the debrief will be presented and the learning at strategic level shared with all LPA commanders. They will in turn share the findings with their strategic and tactical partners, including community safety partnership leads.
- At Chief Inspector level, there is a monthly Neighbourhood policing Ops Board where all the tactical learning will be shared with a task to implement the lessons learnt across each of their towns and high streets on their local areas.
- In addition to this there are monthly CPD sessions being delivered by the Modernising Neighbourhood Policing Programme team to all Dedicated Neighbourhood Officers and PCSO’s. The operational learning from the review will be driven through these presentations in order that the benefits can be delivered and felt at the local level within our communities.
- Finally, the corporate development team will ensure that the learning from the review is presented at both strategic and tactical coordination boards and retained as best practice for all future similar operations across the force.

7. WMP to work with partners to address retail crime incidents, target prolific offenders.

- **The joint OPCC and WMP Business Retail Crime events in 2024 and this year have been well received by WM Retailers and very well attended, with requests from Retailers for more such workshops and joint working. Is enough resource focussed on the preventative and partnership work with Retailers – to effectively address and reduce Retail crime?**

7.1 The force only has one person dedicated to business crime – Jacqui Every, Business Crime Co-ordinator. The main part of Jacqui’s work is linking at National level with retailers / their loss prevention leads and executive teams to drive the education / prevention and partnership work at this level. Jacqui has to be selective on the work she undertakes and the retailers she engages with as the demand is far too great for one person.

7.2 At a local level some LPAs have staff dedicated to business crime, with either a small team (Sandwell and Birmingham) or one dedicated officer (Walsall). These staff work to deliver the prevention and partnership work alongside DNOs. However, those LPAs without a dedicated resource do rely on DNOs / LPA staff to undertake this work when they are able.

7.3 Each LPA has a business crime co-ordinator (usually as Sgt level) and they meet with Business crime force lead and co-ordinator once a month to update on progress / share best practice / discuss blockages and barriers.
To effectively address and reduce retail crime more resource is required at force and local level.

- **Sadly, verbal and physical attacks on shop workers are increasingly seen by shop-workers as a regular part of their job. This is clearly unacceptable. What can be done?**

7.4 As previously mentioned this needs all offences to be reported, with good quality evidence and a support for prosecution – ongoing work with OPCC and retailers to address this.
Retailers also need to invest in CCTV / BWV and take advice on product placement / store design.

7.5 Education and challenge of societal issues is a major part of this work, particularly education of younger generations. Offenders involved in shop theft / violence are usually offenders also involved in ASB and other crime in town centres. Ideally this education needs to start in schools / colleges. More engagement with our Schools officers / DNOs to be a part of this and not just a part of the investigative work.

- **How are prolific Retail offenders being targeted? What more would you like to be able to do and what is preventing this?**

7.6 In line with this, more support is required from the criminal justice system, Media often report on poor sentencing outcomes for prolific offenders, including the organised crime element. Work ongoing with CJ Lead to understand what influence (if any) WMP can have over this, however this also needs leverage at a national level.

7.7 Op Opal – national project to look at the organised crime element of business crime – WMP are well linked in.

- 7.8 Op Sale – a national project which is addressing the onward sale of stolen goods – e.g. sale at Car Boots / online through Facebook market place / eBay etc. This is in the very early stages but again WMP are engaging well.
- 7.9 Work in Coventry and Wolverhampton with National Business Crime Solutions who have a national data sharing agreement with UK Policing through the National Business Crime Centre. NBCS collate data and stats from 38 major UK retailers (40,000 nationwide stores) and turn the information into intelligence packages. Local tactical meetings are then attended (on a fortnightly basis) by NBCS, retailers, and police and a joint action plan formulated for these prolific offenders, many of whom are involved in organised crime. Success of this is the partnership approach in dealing with the offenders who cause us the most harm.
- 7.10 Some NHTs are now working more closely with probation, which is helping to set more specific licencing conditions. This makes it easier to recall the prolific offenders. Having dedicated people within each LPA to focus on prolific offenders works well, they can focus on these individuals, work with key partners to get better outcomes and ensure cases are being linked – again for a more impactful CJ outcome.
- 7.11 Systems like Auror, Shopsafe, etc are essential tools for those officers in identifying and connecting offences, which is why, like many forces are looking to implement single sign on capability to officers.
- **Is a different approach required by WMP when supporting and helping prevent retail crime with large retailers and small and medium size, possibly family-run, retailers?**
- 7.12 The approach does already exist. WMP Business Crime co-ordinators work with LPA's to create greater communication with Associated Independent Stores (AIS). AIS are an organisation supporting independent retailers. WMP already engage with them, who are regularly invited to our events.
- 7.13 To add to this, it was noted at the last SPOC meeting that some local independent businesses are reluctant to report to the police because of reprisals, many do not have CCTV and therefore we would struggle to evidence incidents. Work is on-going to strengthen these relationships, particularly with the introduction of DNO's, which should now become integral as part of their duties. Through this, effective crime prevention advice is provided.
- 8. Work with local councils, traders, Business Improvement Districts and Business Crime Reduction Partnerships to support a safe and thriving retail and night-time economy, reducing crime and anti-social behaviour.**
- **How is WMP currently working with local councils, traders, BIDS and Business Crime Reduction Partnerships to deliver this action?**
 - **Are you satisfied with how this is progressing?**
 - **Have you got the resources required focussed on this area of delivery to achieve this?**
- 8.1 This has been addressed in part under action 8.4 BCRP activity is supported by local officers, but there is not a consistent picture across the force. On those LPAs with dedicated business crime resources (Birmingham, Sandwell and Walsall) the engagement will be more regular and more

effective, and the partnership much stronger. In other areas it will be the DNOs who will be the point of engagement; however, they are not solely dedicated to business crime and retail. However, BID and partnerships all feature in Local Authority co-ordination to deliver retail crime prevention.

8.2 Experience across the West Midlands shows that engagement with BIDs is very good and there are lots of examples of strong BIDs across the force area working in partnership daily with Neighbourhood Teams. However, BCRPs are more challenging. BCRPs run extremely well when they are owned by local businesses and run by the BID (Birmingham being an excellent example).

9. Support the Stop Shop Theft pledge

- **How is work on this progressing?**
- **Is this something you think will be useful?**
- **How can we best jointly support this?**

9.1 This links to the Crime and Policing Bill 24/25. It is not yet law as it is still going through the legislative process. It has completed the House of Commons and is currently in the House of Lords, with a second reading held on October 16, 2025. After the second reading, it will move on to the committee stage and subsequent readings in the House of Lords before it can receive Royal Assent and become law.

9.2 The relevant parts of the bill for retail crime are that it will create a standalone offence of assaulting a retail worker, and to remove the threshold of £200 for low-value thefts.

9.3 In terms of 'will the bill be useful', anything that strengthens our approach to retail crime and gives us additional powers is useful. It is the application of the laws and the support from partners that are important. In relation to assaulting a retail worker, we will need to be aligned with CPS and the court system to ensure that the offence and any subsequent sentencing are treated with the seriousness that they deserve.

9.4 In terms of the £200 threshold WMP have had a policy in place since November 2023 regarding threshold and out of court disposals.

9.5 The policy states that for a shop theft of under £100 in value with no aggravating circumstances then a Simple Community Resolution may be offered. For a shop theft of under £300 a Conditional Community Resolution or Conditional Caution may be offered. For a shop theft of over £300, or where there are aggravating circumstances then a Conditional Caution or Charge must be given.

9.6 The aggravated features are as follows:

- Going equipped to steal (e.g. de-taggers)
- Evidence of pre-planning
- 2 or more offenders involved where this offender played a leading role
- Adult using a child to commit crime
- Threats of, or use of violence
- Breach of trust
- Deliberate targeting of a vulnerable victim
- Previous convictions

9.7 When the bill becomes law, I do not think that the above will change, and therefore WMP are almost ahead of the game anyway as we do already deal with crimes

where the value is less than £200 – either by Simple Community Resolution or by other methods if the offence is aggravated.

- 9.8 What the bill may do is encourage more retailers to report crimes under the £200 threshold. At present there are retailers who do not report low level thefts as they believe the police will not deal with them.

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