Hate Crime Safer Merton Strategic Work Plan 2017 – 2021



Table of Contents

Foreword	
Introduction	2
What is a Hate Crime?	2
What is a Hate Incident?	3
Who is Affected	4
Local and National Policy Approaches	4
Present Situation and Current Reporting Levels	5
Our Vision for Merton	7
Strategic Aims	7
Themes	11
Four-Year Plan	12
Objectives	15
Theme 1 - Coordination	15
Theme 2 - Prevention	22
Theme 3 - Provision	
Theme 4 - Protection	34
Glossary	36

Foreword

Councillor Edith Macauley MBE

Cabinet Member for Community Safety, Engagement and Equalities

Merton is a diverse and internationally known borough. As a local councillor for 18 years and lead member for Community Safety, Engagement and Equalities, I am proud to serve your borough. Merton's population is changing. We have over 200,000 residents speaking over 100 languages. Each year Merton welcomes millions of additional people to the borough who visit our local parks and green spaces, diverse shopping facilities, and the annual tennis championships. Merton's crime partnership is strong and we work hard to ensure that Merton maintains its position as a safe borough.

Merton is committed to tackling all forms of crime and I work with partners to ensure that the maximum sanctions are sought against all crime. This plan, our new Hate Crime Strategy, sets out our commitment to tackling perpetrators of hate crime and identifies how we will support our victims. This strategy would not have been possible without the valuable input from various community organisations who have offered their advice and support, helping us work together to make Merton a safer place for all.

Hate crime has no place in our communities or in our society. The publication of this strategy, and the work behind it, comes at a time where many people are uncertain about their place in society after the United Kingdom's decision to leave the European Union. Ethnic and faith communities have reported anxiety about a climate of hostility targeted at those who are identified as

'foreigners'. Thus, I am proud to endorse this strategy, which offers a robust approach to tackling the issue of hate crime in our borough while also offering support and guidance for those who have fallen victim to such crimes.

What has struck me most about the data and research behind this strategy is the scale of underreporting seen in hate crimes. Too often, these crimes are not reported to police, meaning that victims are not able to access the support they need and perpetrators are not brought to justice for their crimes. Our goal is to provide people with the confidence to report hate crime by offering multiple approaches to reporting combined with wrap-around support to ensure the victims' health and wellbeing is always a priority.

Our borough succeeds and thrives when the community is united and people are able to live harmoniously. These qualities are a big part of what makes Merton a wonderful place to call home and we should continue to strive to make the borough welcoming to all.



Introduction

Hate crime is an issue that affects not only individual people but also entire communities. 74% of Londoners say they are concerned about hate crime and this comes as recorded figures saw an increase after the United Kingdom's vote to leave the European Union, with more than 3000 allegations of hate crime made to UK police in the week before and after the vote on June 23rd. This represents a year-on-year increase of 42% and led the head of the National Police Chiefs' Council to make the following statement:

"The referendum debate has led to an increase in reporting of hate crime. It is very clear in the last couple of weeks that more people have been aware of experiencing such incidents than we have had before"

There are those who see the referendum outcome, as well as other recent significant events and political developments, as a legitimisation of their intolerance and hatred and believe they have a 'green light' to act upon these views. Events like these bring hate crime into the media spotlight, sparking public outrage that such crimes could be occurring. However, this strategy aims to foster an understanding that hate crime remains a constant issue that is continually having a large impact on its victims and the community.

What is a Hate Crime?

A hate crime is defined as "any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic; specifically actual or perceived race, religion/faith, sexual orientation, disability and transgender identity"². A hate crime may also be committed against a person by association, such as against the parent of a disabled child or the partner of someone of a different ethnicity. Hate crimes are now also recognised as a form of abuse in relation to safeguarding adults at risk; this stems from the introduction of the Care Act 2014 and the revised London procedures that were launched in 2016.

¹ Mark Hamilton, quoted in *The Guardian* (2016) - https://www.theguardian.com/society/2016/jul/11/police-blame-worst-rise-in-recorded-hate-on-eureferendum

² A Hate Crime Reduction Strategy for London (2014-17), MOPAC - https://www.london.gov.uk/sites/default/files/mopac_hate_crime_reduction_strategy.pdf

Hate crime, as monitored by the Metropolitan Police, can be separated into five strands:

- 1. Disability
- 2. Race
- 3. Religion/Faith
- 4. Sexual Orientation
- 5. Transgender Identity

Despite these being the five strands monitored by police it is noted within the MOPAC (Mayor's Office for Policing and Crime) Hate Crime Reduction Strategy that local areas are free to include other strands when developing their approach to hate crime, and so other characteristics such as gender and old age are considered within this strategic approach.

What is a Hate Incident?

It is important that this strategy recognise hate incidents as well as hate crimes. The MOPAC Hate Crime Reduction Strategy defines a hate incident as "any non-crime incident which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic; specifically actual or perceived race, religion/faith, sexual orientation, disability and transgender identity" ².

If the victim or any other party involved believe something to be a hate incident, then it should be logged as such by the person who is recording it. The Metropolitan Police record all reports of hate incidents however not all incidents will meet the threshold necessary to be classed as criminal offences; those that do are recorded as offences. Hate incidents can take many forms, examples of which include but are not limited to hoax calls, online abuse, offensive jokes, and displaying or circulating discriminatory literature or posters³.

Although a hate incident may not constitute a crime, it is still important to report it as this can help ensure that victims receive any guidance and support they may need. Additionally, the police and other authorities can use this information to target resources and gain a greater understanding of the issues facing specific communities. Police presence and understanding of hate incidents could also help to prevent an 'incident' turning into a 'crime'.

³ Citizens Advice - https://www.citizensadvice.org.uk/discrimination/hate-crime/what-are-hate-incidents-and-hate-crime/

Who is affected by hate crime?

Hate crime is a social problem as it not only harms the victim but also is deeply damaging to entire families and communities. A lack of action in tackling hate crime can lead to isolation and victimisation of individual people and vulnerable groups, as well as the polarisation of entire communities. Victims can experience hate crime based on various/multiple aspects of their selves e.g. a homosexual disabled resident may be the subject of homophobic hate crime and/ or disability hate crime. It is important to understand that there is no specific offence of 'hate crime' in criminal law in the UK, however there are existing offences (e.g. threats, physical assault, harassment, etc.) which, when motivated by hostility or prejudice, are categorised as a hate crime. This can influence how the offence is investigated and can lead to an enhanced sentence. It should also be recognised that hate crime may be motivated by hostility of other characteristics beyond the monitored strands e.g. gender, age, and appearance.

The Home Office and MOPAC strategic documents use the term 'victim' when referring to those who have a hate crime committed against them, and so this strategy will use the same terminology throughout. While this term is used to ensure consistency amongst strategies, it should be noted that this document respects the very personal and individual nature of hate crime and so recognises people's right to self-define and refer to themselves as 'survivors' or other terms if they so wish.

What are local and national policy approaches to tackling hate crime?

In 2014, MOPAC published "A Hate Crime Reduction Strategy for London"⁴. This is a four-year plan (concluding in 2017) which reflects the Mayor's commitment to tackle hate crime and includes recommendations for the Metropolitan Police, the Crown Prosecution Service, and other criminal justice partners in London. More recently in 2016, the Home Office released the UK Government's plan for tackling hate crime⁵, which sets out a programme of actions to tackle hate crime until May 2020. These two strategies (which can be accessed below) form the basis from which this strategic plan has been developed. This strategy will also be fully aligned with MOPAC's Policing and Crime plan 2017-2021 upon its release in March 2017. Other strategies also refer to hate crime, including the London Multi-Agency Adult Safeguarding Policy and Procedures⁶, which identifies hate crime as a type of abuse. It uses the police definition stated in this document while noting that the definition is based on the perception of the victim or anyone else and is not reliant on evidence. It also includes incidents that do not constitute criminal offences.

⁴ A Hate Crime Reduction Strategy for London (2014-17), *MOPAC* - https://www.london.gov.uk/sites/default/files/mopac_hate_crime_reduction_strategy.pdf ⁵ Action Against Hate: The UK Government's Plan for Tackling Hate Crime, *Home Office* -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/543679/Action_Against_Hate_-

UK Government s Plan to Tackle Hate Crime 2016.pdf

⁶ London Multi-Agency Adult Safeguarding Policy and Procedures, *London Adult Social Services* - http://londonadass.org.uk/wp-content/uploads/2015/02/LONDON-MULTI-AGENCY-ADULT-SAFEGUARDING-POLICY-AND-PROCEDURES.pdf





The present situation and current reporting levels

Police data in itself does not provide a full picture of the current hate crime situation due to the huge levels of underreporting seen in hate crimes. This challenge means the importance of additional sources must be considered, such as the Crime Survey for England and Wales (CSEW hereafter). The CSEW measures the extent of crime in England and Wales by asking people whether they have experienced crime in the past year, providing the ability to find out about crimes which are not reported to or recorded by the police.

Comparing data sets with those of the past is also problematic given differing recording practices and changes in the relative priorities given to these offences by police. There has been progress in recording practices in the past year as police forces improve their compliance with the National Crime Recording Standards⁷. This, combined with greater awareness and improved willingness to come forward, has likely been a factor in the increase of reported hate crimes in the past years.

Understanding current statistics is important in building a profile of both the victim and the suspected perpetrator of hate crimes and incidents. Interpreting these statistics, combined with building a greater awareness of the needs of various groups within the community, will result in the tailoring of awareness and support services to best meet the needs of the community.

UK context

- ➤ In 2015/16 62,518 hate crime offences were reported to police across the UK an increase of 19% from 2014/15⁸
- > Of these, racially motivated crimes were the largest proportion, making up 79% of the total (49,419 crimes)
- > The Home Office believes this increase in figures to be reflective of victims' increased willingness to come forward, combined with an improvement in crime recording techniques and a greater awareness of hate crime
- These recorded figures are significantly below that recorded by the CSEW. Although more recent data is not yet available, data from 2012/13 and 2014/15 show an average of 222,000 hate crimes taking place per year⁹ (compared with 62,518 recorded by police)

⁷ Crime Recording General Rules, *Home Office* (2016) - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/566188/count-general-nov-2016.pdf

⁸ Hate Crime Dashboard, *MOPAC* - https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-research/crime%20/hate-crime-dashboard

London and Merton context

- > The Met has seen an increase in reported levels of Hate Crime from 15,004 offences (in the year ending Sept 2015) to 18,341 (in the year ending Sept 2016)
- > Of this latest figure, Merton has seen 331 recorded hate crimes in the year finishing September 2016
- > This figure is fortunately low compared with many other boroughs however it is higher than that of the neighbouring boroughs of Kingston, Sutton, and Richmond
- > Hate crime in Merton has increased since 2012 at a faster rate than the Metropolitan Police Service area as a whole
- > Racially aggravated offences make up the largest proportion of hate crimes committed in Merton 76% of the total
- > The majority of victims were aged 31-40 (29% of total) and 19-30 (26% of total)
- > 5% of victims were children (those under the age of 18)
- > 12% of suspected perpetrators of hate crime were under the age of 18
- > Four suspected perpetrators of hate crime were linked to more than one crime report
- > Eight of the nine offences they were involved in resulted in no further action and the one charged resulted in a 'not guilty' verdict
- > Two thirds of suspects were aged over thirty. This might imply that hate crime is largely perpetrated by mature adults against mature adults, but one must consider the underreporting present in other age groups and whether this has resulted in a skewing of the data

This section has provided an overview of the data in order to give some context to the strategic plan; however, more statistical information and a breakdown of wards within Merton are available in the hate crime profile embedded below:



⁹ Hate Crime, England and Wales 2014-15, Home Office https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467366/hosb0515.pdf

Our vision for Merton

London is known as a city where people from all backgrounds and walks of life are able to live in freedom and tolerance. The goal is that "the place you live in, the communities you belong to, and the individual that you are should not disproportionately impact your exposure to crime" This strategic document is specifically targeted at tackling the issue of hate crime in the London borough of Merton however it also feeds into the wider aim of the Safer Merton Partnership to encourage community cohesion and ensure the safety and wellbeing of local residents.

Though our ultimate vision for Merton is one in which we will see zero instances of hate crime, our current aims include seeing an increase in reporting of hate crime, demonstrating public confidence that their reports will be taken seriously by authorities. We also wish to see a greater awareness of hate crime amongst members of the public, displaying an emotional intelligence and common respect.

Merton is fortunate in having a comparatively low crime rate in London and it has always been seen as a great place to live, with the borough enjoying high overall life expectancy and performing well with regards to education, housing, the environment, and many other factors. However, there are currently areas of the borough where residents need a greater level of support in order to reach their full potential.

The residents form a critical part of what makes Merton a great place to live and through strategies such as this we hope to foster an environment where people are tolerant and understanding of one another, displaying emotional intelligence and working together to better the community. In line with the Mayor of London's vision for the future of policing and crime in London, this strategy takes a victim-oriented approach, putting the victim's safety and wellbeing at the heart of everything we do.

Strategic Aims

Merton's hate crime strategy, outlined in this document, aims to develop a victim-oriented, multi-agency approach to tackling all forms of hate crime across the borough. Over the next four years, the council will come together with partners including the Metropolitan Police and groups representing the local community to foster a strong approach to tackling hate crime and supporting its victims. The following strategic aims will be carried out through a coordinated strategy implemented by all relevant partners.

¹⁰ Cllr Lib Peck, leader of Lambeth Council – London Councils - http://www.londoncouncils.gov.uk/node/30508

- I. Preventing Hate Crime
- II. Protecting the victim and reducing repeat victimisation
- III. Providing suited support to people who have experienced or are supporting victims of hate crime
- IV. Developing and implementing an integrated, robust, and coordinated approach to tackling suspected perpetrators

I. Preventing Hate Crime

Prevention work regarding hate crime needs to operate through a multi-level approach in order to be effective. Prevention of hate crimes will come about through a robust combination of educating communities in cultural understanding and tolerance, strongly enforcing the law, treating hate crime as the serious issue it is, and publicising successful prosecutions to act as a deterrent and to make it clear this kind of behaviour is not accepted within our society.

One of the largest issues around hate crime is its underreporting which severely hinders the authorities' ability to respond to such issues. For this reason, awareness campaigns are an important part of prevention as they can help to ensure people are aware of what hate crime is, what their rights are, and how/ where they are able to report incidents. This information can give victims more confidence in reporting these crimes and thus lead to a stronger response from the appropriate authorities.

Educating communities on the value of diversity and cultural understanding and thus encouraging greater social integration is the best defence against hatred and intolerance. A particular focus should be on educating children in such issues so that these values are instilled from a young age. This being said, it is crucial that this strategy considers the entire family unit with regards to education.

Migration to the UK must also be considered when developing an approach to hate crime awareness; it is possible that those from certain backgrounds will carry over rivalries from their home countries to the new communities within which they settle. Thus, it is important to make those entering the UK aware of the stringent laws that govern hate crime and the zero-tolerance approach that the police take. Equally, those already residing in the UK must develop an awareness of other cultures and traditions and so should understand and celebrate the migration that sees a community becoming more diverse.

II. Protecting the victim and reducing repeat victimisation

Ensuring the safety of residents is this strategy's ultimate priority and work can be done to achieve this through the promotion of relevant available resources which protect residents and aid them in seeking help and support. The use of technology for personal safety and hate crime reporting should be explored further to consider its role as part of the borough's hate crime strategy, examples of which include the following:

- ▶ bSafe App¹¹
- Self Evident App¹²
- > True Vision website¹³

It cannot be assumed that everyone will have the knowledge or ability to access these resources and so work needs to be done around raising the profile of these apps and websites, ensuring people are able to use them and working to overcome language barriers which may limit their potential.

While these apps and other technical solutions can provide assistance and a sense of security to many, there remain those who are vulnerable and will not feel comfortable in using, or have access to, this technology. These people must also be considered and provided for within this strategy. This can be achieved through community outreach events in which police officers and community partners speak with people face to face, offering one-to-one support to build future resilience and facilitate more conversations around hate crime.

III. Providing suited support to people who have experienced or are supporting victims of Hate Crime

Supporting victims of hate crime should take the form of counselling and emotional support as well as support for those as they go through the reporting process. The reporting process, and seeing it through to a successful prosecution, can be a very stressful time for the victim and so multi-agency support must be made available for people going through this. Coordinating this approach will involve the Safer Merton team, the Metropolitan Police, and guidance from community groups within the borough. This will result in shared practice and better communication between agencies, resulting in a clearer and smoother reporting path for the victim. Every resident's experience of hate crime will be unique and thus any support offered to victims should be suited to their needs.

¹¹ bSafe – The End of Worry - http://getbsafe.com/

¹² Self Evident – Witness Confident - https://www.witnessconfident.org/ads-list/17-simplify-life?gclid=CKvA4PeGxNACFUY8GwodQJMJpg

¹³ True Vision - http://report-it.org.uk/home

The successes of current support service such as the One Stop Shop for Domestic Violence and IDVAs (Independent Domestic Violence Advocates) should be drawn upon in the development of hate crime specific services. Hate crime, much like domestic violence, is a deeply personal and distressing crime and therefore requires tailored responses and support. MOPAC will be establishing a Hate Crime Victims' Advocates scheme* across London that will target specialised support for high risk victims of hate crime and Merton will work closely with this service to ensure it is delivering the best possible outcomes for residents.

From the Council's perspective, it is of great important to support community organisations in their provision of 'safe areas' of hate crime reporting and support for victims. Some residents do not feel comfortable in speaking with the police and so wish to report their experiences to those whom they trust. Community organisations will play an integral role in providing support and guidance, and will be at the heart of any action taken.

IV. Developing and implementing an integrated, robust, and coordinated approach to tackling perpetrators

This will involve robust policing of hate crimes in which every report is taken seriously and the victim is treated with respect. An improvement in police response and in prosecution rates will be partly facilitated by building public confidence in reporting such crimes as well as furthering knowledge of what information is required by police to increase the chances of a successful prosecution. Past cases have demonstrated how a series of low-level offences have escalated into serious crimes (in rare cases even murder) and so a commitment to identify and act on multiple incidents will be made.

Furthermore, where hate crime perpetrators are caught, they will need to be prosecuted to the full extent of the law; the responsibility for this would lie between the Metropolitan Police and the Crown Prosecution Service. Other methods of taking action against perpetrators will be investigated, such as reviewing the terms of their tenancy if they currently reside in rented accommodation.

Hate incidents and hate crimes can be equally as distressing to the victim and so the authorities' response should take consideration of this, providing services for those perpetrators who are often younger and whose actions are below the threshold of what is considered prosecutable.

^{*} MOPAC Draft Policing and Crime Plan 2017-2021 (this document is currently under consultation and is subject to change before final release)

To deliver the strategic aims set out in this plan there will be a focus on the following themes:

1. Coordination

Aim: To develop an understanding of the victims' needs and their journey through the criminal justice system to ensure that Merton's residents can access reporting and support services easily and efficiently

How: By ensuring that both conversations and actions regarding hate crime are made with input from all stakeholders and that this be embedded into service plans and coordinated effectively

2. Prevention

Aim: To provide our residents with the knowledge and skills to stay safe, whilst challenging those who identify with the perpetration of hate crime. Developing and strengthening community cohesion through unifying our residents

How: Raising awareness through regular campaigning, projects, and programmes with a focus on Hate Crime Awareness Week in October. Educating the community, with particular attention paid to young people and children, on the importance and merits of diversity and fostering emotional intelligence

3. Provision

Aim: To ensure Merton is able to deliver the best support services possible, with a focus on supporting third sector groups in the delivery and development of third party reporting routes

How: By working with partners and the community to provide a range of support services which assist in a practical sense with regards to the reporting (and potentially trial) procedures while also providing emotional support to victims

4. Protection

Aim: To provide a robust response to hate crime across the partnership, taking the most robust enforcement action possible against borough-based perpetrators

How: By ensuring that the police and partners are given equalities and diversity training and so can identify factors which could flag a regular crime as being motivated by hate, in the process ensuring these are taken seriously and acted upon accordingly

Our Four-Year Plan

Due to the prominence of hate crime and the impact it has on individuals and communities, the Hate Crime Strategic Plan 2017 – 2021 will initially be overseen by the Safer Stronger Executive Board. Moving forward, its implementation will ideally be overseen by the Victims Board. This will deliver the governance and strategic oversight of partnership delivery to our victims. Working with a range of agencies the meeting will interrogate data, check that we are meeting the needs of residents, and ascertain how the partnership is performing via a robust performance framework. The Victims Board will sit alongside the Locations Board and a newly formed Offender Management Board all of which will then feed into the Safer Stronger Executive Board.

The ultimate aim is to reduce all forms of hate crime, although we may see this occurring even through an increase in reported hate crimes if we are successful in our aim to increase public confidence in reporting. In order to see this positive change we aim to achieve the following:

Year 1 - April 2017 onwards

- The Safer Merton Partnership to work with communities to encourage reporting and reassure them that any report will be taken seriously. Through this we aim to achieve an increase in reported hate crimes year on year as our communities become more confident in reporting to the local authority and/or police
- > To work with the police and other partners to improve recording practices
- > To explore funding options regarding hate crime prevention projects
- > To ensure we utilise information arising from the 2016 Safer Merton Hate Crime Profile throughout our approach
- > To develop greater linkages between MOPAC's 2017-2021 Policing and Crime Plan and Merton's strategic documents
- > To explore the possibility of a 'One Stop Shop' for reporting hate crime and receiving support
- > To develop a stronger and more clearly-signposted network of third party reporting sites

- > To begin consideration of the 'Think Family' offer to fall in line with protocols being released in March 2017
- > To begin to develop our educational approach to tackling hate crime, working with schools to educate young people
- > To begin using information from Safeguarding Adults to inform work around hate crime, and vice versa
- > To allocate responsibility for overseeing this strategy throughout the four years
- > To review our outcomes, set targets, and agree how to progress the agenda in the coming year
- > A commitment to exploring the feasibility of including gender and elder abuse as additional strands of hate crime which can be monitored in Year 2

Year 2

- > To conduct a review of our hate crime strategy to ensure it is fit for purpose
- > To develop stronger links with third party providers (e.g. those with the capability to receive and process hate crime reports) to improve the support available to the victim
- > To begin monitoring further strands of hate crime such as gender and elder abuse, gathering statistically significant data in the process
- > To integrate the Think Family protocols into hate crime prevention work
- > To continually explore funding options available
- > To further develop our educational approach in tackling hate crime
- > To explore pan-borough working to ensure that needs of our victims of hate crime in the south west cluster are fully understood

> To review our outcomes and set targets for the coming year

Year 3

- > To continue and further develop the work undertaken in years 1 and 2 by developing further action plans
- > To undertake a full review of the strategy ensuring that consideration is given to working on further strands of hate crime such as gender and elder abuse, using the previous year's findings to tailor the response and support offers
- > To develop our Think Family offer, further evolving a strategy which takes consideration of the victims' and perpetrators' entire family unit
- > To continue to develop awareness campaigns to encourage reporting and make residents aware of their personal safety
- > To review our outcomes and set targets for the coming year

Year 4

- > To continue and further develop the work undertaken in the first three years of this plan, evaluating our successes and ensuring the strategy continues to have the best possible outcomes for residents
- > Conduct a full review of the progress over the last four years
- > To ensure that work on hate crime is carried on after the 2021 end date of this document

Theme 1: Co-ordination: Ensure that the response to Hate Crime is shared by all stakeholders, embedded into service plans, and coordinated effectively

				Reso	urces	Progress Green/Amber/Red	
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date	
1.1 Page 61	To gain a clearer understanding of hate crime in Merton.	 A clear picture of the levels of hate crime occurring in the borough An understanding of who is being targeted and who the suspected perpetrators are A greater understanding of the impact that hate crime has both on its victims and the wider community A hate crime profile exploring 	 Intelligent use of police data to understand the issues currently facing the borough More engagement with communities to understand their needs Greater communication between police officers dealing with hate crime issues and those in the council 	Safer Merton & Metropolitan Police	Safer Merton to share the hate crime profile and related strategies with the public Q1 Year 1		
		trends in order to better understand communities and thus drive local plans to combat hate crime Intelligent use of the hate	understand communities and thus drive local plans to combat hate crime available hate crime data - Use InfoMaps to look at the relationship between hate	 Use InfoMaps to look at the relationship between hate crime and other data sets 	Safer Merton data analysts	Completed Hate Crime Profile Q1 Year 1	Completed
		tackle the issue of hate crime in Merton - A reduced risk of those being targeted becoming repeat victims	- Disseminate this information to the police and other authorities so they are able to use the information to contribute to	Safer Merton data analysts	Intelligent use of hate crime profile Q2 Year 1		

				Reso	urces	Progress Green/Amber/Red
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
		Higher levels of satisfaction with the police from hate crime victims	their own strategies for tackling hate crime - Annually review the profile to support this strategy and the strategic assessment	Safer Merton data analysts	Review the hate crime profile Annually	
Pag	- Explore victims (quality) conduct behavior Run correction with viction understate they have with 'the	Explore ways of surveying victims such as through the 'quality call backs' conducted in anti-social behaviour cases Run community sessions	Safer Merton	Explore possibility of surveying victims Q2 Year 1		
je 62		with victims to better understand the process they have been through, with 'them telling us' rather than 'us telling them'	Safer Merton	Run workshop Q1 Year 2		
1.2	Encourage greater social integration as the best defence against hatred	 For social integration to be at the heart of work done to ensure a safer Merton Residents having meaningful interaction with one another, building strong bonds within the community For residents to display an emotional intelligence and celebrate the diversity that exists in Merton 	 Align our work with that of the Deputy Mayor for Social Integration (Matthew Ryder, at the time of writing) to support the development of stronger and more resilient communities Restore real neighbourhood policing, bringing the police closer to communities 	Metropolitan Police & Safer Merton & Community Groups	Encourage social cohesion and integration Continuous	

				Reso	urces	Progress Green/Amber/Red
Objective		Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
1.3	To develop a stronger network of third-party sites and centres from which hate crimes can be reported and	 Through the council website, victims will be able to clearly navigate between services commissioned by different bodies For important hyperlinks to be included on other websites, such as the Merton Safeguarding Adults webpage 	 Exploring potential new websites and centres which are able to take hate crime reports Updating the hate crime section of the council website to clearly signpost a network of sites which are able to take hate crime reports Speaking with existing sites/centres to understand how they can be assisted to develop their capacity in taking hate crime reports and supporting victims Explore the potential for the 	Safer Merton	Update Merton's hate crime website Q1 Year 1	
Page 63	people can feel secure	the council's hate crime portal as well as how and where hate crime can be reported in general Higher levels of hate crime reporting, demonstrating an increased confidence in		Safer Merton	Supporting hate crime reporting sites and centres in Merton Continuous	
		authorities - Strong links with support services and referral mechanisms which are to be commissioned by MOPAC*	use of applications as methods of reporting hate crime (see objective 3.3 for details) - To explore the feasibility and benefits of implementing the 'Safe Place Scheme' in town centres ¹⁴	Safer Merton & Safeguarding Adults	Investigate potential sites for Safe Place scheme Q1 Year 1	

¹⁴ Safe Place Scheme - http://www.widgit.com/safeplacescheme/

				Reso	urces	Progress Green/Amber/Red
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
1.4 Page	Organise and hold a range of engagement events to raise awareness and provide wider opportunities for reporting	 A quarterly event, held either in the civic centre or venues in the borough, which allows people to learn about and try apps for personal safety and hate crime reporting The event would make the process of hate crime reporting clearer and would show police officers in a less imposing/ threatening light 	 Train people to be able to demonstrate the applications and websites used to report hate crime Source tablets which will be available at meetings so people are able to experience these reporting methods first-hand Publicise the website for reporting hate crimes (True 	Community groups, supported by the Metropolitan Police and Safer Merton	Launch first event Q1 Year 1	
je 64		 For the event itself to act as an opportunity to report crimes directly to the police by creating a safe and secure environment in which victims can speak comfortably and freely For members of the 	reporting hate crimes (True Vision) so more people are aware of it - Have a regular selection of police officers attending so they are able to build a relationship with the community - Ensure that information and advice provided is accessible to all members of the community - Explore possibility of including a hate crime slot in future Safeguarding networking events	Community groups, supported by the Metropolitan Police & Safer Merton	Run quarterly events Continuous	
		community from different backgrounds to be able to come together and have a meaningful conversation about hate crime - For hate crime to feature in events run by other divisions of the Council (for example, Safeguarding Adults)		Safer Merton	Conduct end-of-year evaluation Q4 Year 1	

				Resources		Progress Green/Amber/Red
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
				Safer Merton	Coordinate with safeguarding event Q1 Year 1	
1.5 Page 65	Create a joint calendar of events	 A combined calendar, accessible to the public, which displays all awareness events and weeks associated with Hate Crime, VAWG, DVA, ASB, and other such issues which impact public protection and community cohesion. The calendar should include various history months, some religious celebrations such as Eid, and more A more informed public and ultimately greater attendance to events and response to campaigns run by Safer Merton 	 Coordinate with those responsible for Hate Crime, VAWG, DVA, ASB etc. to ensure a live version of the calendar is created and kept up to date and available to the public Involve the Metropolitan Police and allow them access to the calendar whilst also encouraging them to share it with a wider audience 	Safer Merton	A calendar which is to be regularly updated Q2 Year 1 (continuous)	

				Reso	urces	Progress Green/Amber/Red
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
1.6 Page 66-	Share hate crime information and data between relevant divisions of the Council	 Partnership working through better communication between divisions of the council in order to better understand hate crime and the implications it has on different members of the community An enriched hate crime data set, informed by a thorough review of the way certain crimes and safeguarding concerns are flagged 	 Use safeguarding adults data to report on hate crime concerns Examine safeguarding cases to see examples where hate crime has been flagged as a safeguarding adults concern Review strategy based on findings from other sources such as safeguarding adults 	Safer Merton & Safeguarding Adults	Review flagging system for hate crimes in adult safeguarding cases Q1 Year 1	
1.7	To support MOPAC's future campaign activity regarding hate crime on public transport*	 To support and do work around a campaign and engagement activity underway which will make clear that hate crime will not be tolerated on London's transport system A fostered environment where residents feel safe on public transport and where they feel confident to report any issues if one does occur 	 Review the MOPAC and TfL campaign and activity once it is released Support the campaign and examine the possibility of adapting or utilising it within a Merton context to ensure it results in the best possible outcome for residents 	Safer Merton	Publicise and support the campaign upon release Q1 Year 1	

^{*} MOPAC Draft Policing and Crime Plan 2017-2021 (this document is currently under consultation and is subject to change before final release)

				Reso	urces	Progress Green/Amber/Red
	Objective	Outcome	Output/Actions	Lead officer/ agency	What is required and by when?	Comments and update date
1.8 Page 67	Explore funding options available and develop bids	 A co-ordinated approach to funding applications which sees the council working alongside partners and community organisations to develop bids for funding which can be used to further hate crime awareness and support services For the council to support community organisations in their attempts to get funding and in turn for these organisations to work with the council to apply for other funding streams 	 Hold regular meetings between Safer Merton and community groups to explore currently available funding and come to a decision how to approach these Explore the possibility of using small grants to meet rising demand of hate crime reporting as victim confidence increases* Explore funding available from the Safer Neighbourhoods Board 	Safer Merton & Community Groups	Applications for available funding As and when they become available	

^{*} MOPAC Draft Policing and Crime Plan 2017-2021 (this document is currently under consultation and is subject to change before final release)

Theme 2: Prevention - Preventing Hate Crime through proactive policing and a change of people's attitudes

				Resource		Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.1 Page 68	To consider hate crime in the context of education of children and young adults	 An increased awareness and understanding amongst young people of those who are different from themselves, be this with regards to race, faith, sexuality, gender identity, or disability A greater understanding amongst young people of their rights and responsibilities within society A strong approach to educating children on 	values' by engaging children through PSHE lessons, RE lessons, and informal talks - Explore different educational materials, such as those supplied on the True Vision website 15, which could be used for the above action - Raise awareness of the Stonewall Champions Programme 16 and other such inclusionary programmes, encouraging more schools in the borough to participate - Work with Police Schools Officers to educate students regarding hate crime in a more informal manner, through	VBS Manger & School Improvement Advisor School Improvement Advisor	Engage with students through PSHE, RE, and less formal channels Continuous Work with secondary schools to become part of Stonewall Champions Programme Continuous	
		hate crime through both curriculum and the fostering of informal conversation with teachers, schools officers, and amongst students themselves - Community groups being involved in the		Police Partnership Lead	Schools Officers engaging in informal conversation and PSHE lessons where possible Continuous	

¹⁵ True Vision – Education Support - http://www.report-it.org.uk/education_support
16 Stonewall Champions Programme - http://www.stonewall.org.uk/get-involved/education/education-champions-programme-local-authorities

				Resources		Progress Green/Amber/Red
Objective		Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
		educational approach to tackling hate crime, helping to educate and raise awareness of hate crime amongst young people	te crime, educate and eness of hate - Explore resources available to fund participation activities for young people, helping to foster	Safer Merton & Metropolitan Police & CSF Participation Team	Apply for relevant funding As and when it becomes available	
Page 69				SACRE	To consider examining the effectiveness of RE with regards to understanding differences in faiths Q1 Year 1	
2.2	To further engage with primary schools to educate children in emotional intelligence from a younger age	 A tailored educational approach toward hate crime for primary school students in Key Stage 2 Children who grow up with a strong sense of emotional intelligence and who are able to recognise their rights and responsibilities in society Children who are aware 	 Raise awareness of the Stonewall Champions Programme and other such inclusionary programmes and encourage more schools in the borough to participate Explore resources available which are appropriate in educating Key Stage 2 students on issues surrounding hate crime 	School Improvement Advisor	Work with primary schools to become part of Stonewall Champions Programme Continuous	

				Resources		Progress Green/Amber/Red
Objective		Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
Page 70		of bullying and the implications it has on their fellow students - More schools in the borough to be awarded the UNICEF 'Rights Respecting Schools' Award, which recognises schools' achievements putting the UNCRC into practice within the school and beyond 17. The Level 1 award is currently held by Dundonald Primary School, Merton Park Primary School, and Poplar Primary School	- Include Hate Crime as a topic in Safer Merton's 'Junior Neighbourhood Watch' program so Key Stage 2 children are educated on the topic, along with others such as anti-social behaviour	Safer Merton – JNHW –	Integrate hate crime into JNHW activities Q1 Year 2	

¹⁷ Rights Respecting Schools Award, UNICEF - https://www.unicef.org.uk/rights-respecting-schools/about-the-award/the-rrsa/

				Reso	ources	Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
Page 71	To draw attention to the issue of online hate crime, which is seeing an increase	 A reduction in the number of hate crime cases committed online (though this may be the case despite a noted increase in the number of REPORTED cases) Online hate crime activity is taken just as seriously as that carried out faceto-face Online hate crime to be acknowledged more in wider hate crime publications and awareness campaigns Collaboration between the Safer Merton team and the Metropolitan Police's new 'Online Hate Crime Hub'* 	 Coordinate with police to discuss the prevalence of online hate crime Research the most prevalent forms of online hate crime in the borough (e.g. Trolling) Develop a strategy targeting online hate crime Develop an awareness campaign which makes the illegality and severity of online hate crime clear Support the Metropolitan Police in implementing their Online Hate Crime Hub to ensure it is a success and provides the best possible service for Merton residents Review the way we think about online safety to consider hate crimes which can occur online 	Safer Merton & Metropolitan Police	Support the Online Hate Crime Hub Q1 Year 1	

^{*} MOPAC Draft Policing and Crime Plan 2017-2021 (this document is currently under consultation and is subject to change before final release)

				Resources		Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.4 Page 72	To run a series of public campaigns in order to raise awareness of hate crime and encourage reporting (this is in addition to the events which will be run with the public)	 Higher levels of community awareness and concern of hate crime An increase in the number of hate crimes which get reported to the police Public confidence that their report would be taken seriously and that action will be taken A greater understanding and respect for the diversity which exists in Merton 	 Develop awareness campaigns to be run periodically Tailor campaigns to coincide with other events and observed occasions such as Black History Month, LGBT History Month, and Disability History Month Run campaigns which are targeted towards other national holidays such as St George's Day, St Patrick's Day, etc. to reach out to communities who may feel disenfranchised Include these events in the joint calendar which is to be created (as detailed in Objective 1.5) 	Safer Merton, in partnership with Community Groups	Develop awareness campaigns Q2 Year 1 (continuous)	

				Resources		Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.5	Continually promote the 'Ask for Angela' campaign, which is being championed by Merton Council and the Metropolitan Police ¹⁸	 Create an environment within licensed premises where people can feel safe and secure Ensure the 'Ask for Angela' campaign is directly referenced and explained on the Merton Hate Crime website Increase prosecution rate for hate crime, domestic 	 Gather information and promotional materials about the campaign Clearly explain what it is and include this in the updated hate crime section of Merton Council's website Ensure bar staff and security across the borough receive regular training (this is particularly important given the 	Safer Merton	Update Merton's hate crime website to promote the campaign Q1 Year 1	
Page 73		violence, and other situations which may arise in relation to the 'Ask for Angela' campaign	high turnover of staff in this industry)	Metropolitan Police	Lead in training of bar and security staff and ensure successful rollout of campaign across the borough Continuous	Completed initial training of staff in Wimbledon, Mitcham, and Morden

¹⁸ Ask for Angela campaign (2016) - http://www.bbc.co.uk/news/uk-37855009

				Resources		Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.6 Page 74	To provide one to one support for hate crime victims through the new Hate Crime Victims' Advocates service*	 To build off the success of the IDVA (Independent Domestic Violence Advocate) concept to: Provide specialist and targeted support to high-risk victims of hate crime Access the most appropriate services Assist in navigating court procedures if the case goes down this route Reduce repeat victimisation Increase feelings of safety and wellbeing Reduce the likelihood of victims discontinuing their case before it gets to court 	 Research into the success of IDVAs in relation to their cost Explore funding options to determine the extent to which we are able to support and build off such a service. This will largely be dependent on MOPAC's initial funding which it makes available Determine from conversations with the community whether they believe the concept could be useful to hate crime victims Establish the extent to which such a service will be supported and funded by MOPAC and what the responsibility of the council and local police will be (this will become clear once the MOPAC strategy is released in March 2017) Ensure that any services provided through MOPAC support and compliment existing offers from community organisations 	Safer Merton & Metropolitan Police & Community Groups	Develop the HCVA service in a Merton context Dependent upon launch date	

^{*} MOPAC Draft Policing and Crime Plan 2017-2021 (this document is currently under consultation and is subject to change before final release)

				Resc	ources	Progress Green/Amber/Red
Obje	ective	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.7 Pa	To reassure the public before, during, and after Article 50 is triggered, following the UK's decision to leave the European Union	 Residents will feel safe and secure through the process of leaving the European Union Potential perpetrators of hate crime will be aware of the Metropolitan Police's zero-tolerance approach to hate crime, no matter the outcome or implications of leaving the European Union 	 Release a statement making clear the triggering of Article 50 and eventual leaving of the European Union has no impact on the legal status of hate crime and that the Metropolitan Police and Merton Council will not tolerate such incidents Develop an appropriate awareness campaign which will seek to reassure those 	Safer Merton & Metropolitan Police	Support those when Article 50 is triggered Q1 Year 1**	
ge 75		- EU nationals will not lose their sense of belonging in Merton's communities and will feel safe and comfortable in the borough	who are anxious about the UK's decision to leave the European Union	Safer Merton & Metropolitan Police	Support those when we finally leave the European Union Q3 Year 2**	

^{**} Timeline subject to change dependent on the progress made by government in negotiating terms of leaving the European Union

				Resources		Progress Green/Amber/Red
Obje	ctive	Outcome	Output/Actions	Lead officer/agency	What is required and by when?	Comments and update date
2.8 Page 76	To create an environment of inclusion within sport	 Using the return of AFC Wimbledon to the site on Plough Lane in order to raise awareness of gender, race, faith, LGBT+, and gender issues and discriminatory practices within sport For sports fans, specifically football to begin with, to be educated on the importance of diversity and equality and how this can be achieved through sport 	 Work with 'Kick it Out' 19, the leading organisation for inclusion and equality in football, to enable, facilitate, and work with the club, players, and fans to tackle all forms of discrimination and take their equality responsibilities seriously Link this work with the 'No More' campaign being championed by Merton Council, to create a unified public campaign against hate crime and domestic violence and abuse, utilising sport as a way of reaching people 	Safer Merton	Ensure inclusion and equality is a starring aspect of AFC Wimbledon's return Year 3-4 ***	

^{***} Dependent upon completion timeline for new stadium

¹⁹ Kick it Out - http://www.kickitout.org/

Theme 3: Provision - Improve provision of specialist support and reporting centres

				Resources		Progress Green/Amber/Red
Obje	ctives	Outcomes Actions		Lead officer/agency	What is required and by when?	Comments
3.1	To build off the success of the One Stop Shop ²⁰ for domestic violence by developing a similar regular session for	 Increased levels of hate crime reporting (demonstrating increase public confidence in reporting as opposed to an increase in the number of crimes committed) Increased satisfaction levels 	 Gather statistics on the One Stop Shop and its current successes Speak to those currently involved in its running Speak with the community and gauge whether people feel such an approach 	Safer Merton	Establish feasibility by examining current One Stop Shop Q1 Year 1	
Page 77	victims of hate crime	from victims regarding authorities' response The event to run regularly, providing support for those who seek it	would be beneficial - If so, establish potential supporters who would be	Safer Merton	Explore funding options and link with final MOPAC plan Q2 Year 1	
			 Investigate associated costs and judge whether it is a feasible project Establish whether this concept would compliment MOPAC's Hate Crime Victims' Advocates service 	Safer Merton & Partners	Implement if deemed as feasible Q1 Year 2	

²⁰ Domestic Violence One Stop Shop, *Merton Council* - http://www.merton.gov.uk/community-living/communitysafety/safermertondomesticviolence/domesticviolenceonestopshop.htm

				Resources		Progress Green/Amber/Red
Obje	ctives	Outcomes	Actions	Lead officer/agency	What is required and by when?	Comments
3.2	Develop our 'Think Family' Offer	 For the entire family unit to be considered when examining the issue of hate crime, both in relation to victims and perpetrators To ensure that vulnerable individuals such as children 	- Tailor strategy to consider Think Family protocols, once they are released in Q1 2017. Specifically those regarding mental health and substance abuse	MSCB Manager & Safer Merton	Link in to Think Family protocols Q2 Year 1	
Page 78ო		are safeguarded when a hate crime occurs	In incidents of hate crime, always consider what the impact might be on the relatives of the victim and perpetrator	MSCB Manager & Safer Merton	Update strategy accordingly Q1 Year 2	
3.3	To promote the use of apps relevant to personal safety and hate crime reporting	 An increase in the number of people using the app Increased feeling of safety and security amongst residents A reduction in the number of incidents taking place through an increasingly safety-conscious public 	 Promotion of the app using Merton Council and Metropolitan Police communications The inclusion of the app in the updated Merton hate crime website Consider the use of such an app within Merton Council to ensure staff who work away from the civic centre are accounted for and kept safe 	Safer Merton	To include this app in the updated Merton hate crime website Q1 Year 1	

²¹ bSafe – The End of Worry - http://getbsafe.com/

				Resources		Progress Green/Amber/Red
Obje	ctives	Outcomes	Actions	Lead officer/agency	What is required and by when?	Comments
				Safer Merton & Metropolitan Police	Promotion through comms channels Continuous	
Page 79		- An increase in the number of hate crime reports received by police - Less anonymity in hate crime reports so police have the information they need to successfully follow up a	 Promotion of the app using Merton Council and Metropolitan Police communications The inclusion of the app in the updated Merton hate crime website 	Safer Merton & Metropolitan Police	To include this app in the updated Merton hate crime website Q1 Year 1	
		report - Further awareness amongst both police and the public regarding applications as a method of hate crime reporting		Safer Merton & Metropolitan Police	Promotion through comms channels Continuous	

_

²² Self Evident – Witness Confident - https://www.witnessconfident.org/ads-list/17-simplify-life?gclid=CKvA4PeGxNACFUY8GwodQJMJpg

Theme 4: Protection - To provide effective response to perpetrators outside of and within the criminal justice system

				Reso	urces	Progress Green/Amber/ Red
Obje	ectives	Outcomes Actions		Lead officer/agency	What is required and by when?	Comments
4.1 Page 80	To include alternative strands which can be recorded and measured as hate crimes	 The inclusion of the following monitored strands of hate crime: Gender Elder Abuse 	 Record crimes motivated based on a person's gender or age as hate crimes Gather statistical data to support strategy development in following years Consider additional sources of information such as 'Safeguarding Adults' regarding elder abuse statistics for Merton 	Metropolitan Police	Begin measuring strands Q1 Year 2	
		 A robust strategy to tackle hate crime relating to gender and age, using data gathered in the previous year People to feel comfortable knowing that they are protected no matter their age or gender 	 Analysis of data gathered in previous year Create a profile of victims, perpetrators, and locations Use this data and information to develop strategy specific to these strands of hate crime 	Safer Merton	Develop and implement policy regarding newly measured hate crime strands Q1 Year 3	

				Reso	urces	Progress Green/Amber/ Red
Obje	ectives	Outcomes	Actions	Lead officer/agency	What is required and by when?	Comments
4.2	Take robust action against hate crime perpetrators with regards to housing	 Clear and robust enforcement of tenancy breaches if a hate crime is committed Potential perpetrators will have a clear understanding of the implications that 	 Engage social housing owners as well as private landlords Scope out the legal aspects of this Consider safeguarding implications with regards 	Safer Merton & Head of Housing Needs and Strategy	Explore legal options regarding perpetrators' tenancies Q1 Year 1	
Page 81		come with committing a hate crime - Increased confidence in reporting incidents - Improved social awareness and community cohesion	to termination of tenancies and other action taken - Review the tenancy details of known hate crime perpetrators	Head of Housing Needs and Strategy	Implement and enforce any actions decided Q3 Year 1	
4.3	Ensure that all front line police officers understand the importance of providing a robust response to hate crime	 A police force that appreciates the impact hate crime has on its victims and thus the importance of treating it robustly The police being aware of the specialist services which are available to victims 	- Training and general awareness for police officers to ensure they are aware of the latest services available to victims	Metropolitan Police	Training and awareness Continuous	

Glossary

ASB	Anti-Social Behaviour
British Values	Schools must now promote British Values, defined by OFSTED as 'democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith
CPS	Crown Prosecution Service
CSEW	Crime Survey of England and Wales
CSF	Children, Schools, and Families
DVA	Domestic Violence and Abuse
HCVA	Hate Crime Victims' Advocates Service
IDVA	Independent Domestic Violence Advocate
JNHW	Junior Neighbourhood Watch
Key Stage	Stages of the education system (e.g. KS2 is Years 3-6, KS3 is Years 7-9)
LGBT	Lesbian, Gay, Bisexual, Transgender
MOPAC	Mayor's Office for Policing and Crime
MSCB	Merton Safeguarding Children Board
OFSTED	Office for Standards in Education, Children's Services, and Skills

PSHE	Personal, Social, and Health Education
SACRE	Standard Advisory Council on Religious Education
Safer Merton	The partnership between Merton Council and the Metropolitan Police
TFL	Transport for London
UNCRC	United Nations Convention on the Rights of the Child
UNICEF	United Nations Children Fund
VAWG	Violence Against Women and Girls
VBS	Virtual Behaviour Service
Victim	Those who have hate crime(s) committed against them (however may choose to self-define under other terms such as 'survivor')

This page is intentionally left blank