



## Professional Standards and Integrity Committee of the City of London Police Authority Board

**Date:** THURSDAY, 26 NOVEMBER 2020

**Time:** 11.00 am

**Venue:** VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

**Members:**

Alderman Alison Gowman (Chair)	Alderman Emma Edhem
Caroline Addy	Alderman Gregory Jones QC
Douglas Barrow	Deborah Oliver
Nicholas Bensted-Smith	Deputy James Thomson
Tijs Broeke	James Tumbridge
Mary Durcan	

**Enquiries:** John Cater  
John.Cater@cityoflondon.gov.uk

### Accessing the virtual public meeting

**Members of the public can observe this virtual public meeting at the below link:**  
<https://youtu.be/m7T0ns4XbAU>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**John Barradell**  
Town Clerk and Chief Executive

# AGENDA

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes of the meeting held on 14<sup>th</sup> September.

**For Decision**  
(Pages 1 - 10)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

**For Information**  
(Pages 11 - 12)

5. **OFFICERS ON ACTING AND TEMPORARY PROMOTION AT 30/11/2020**

Report of the Commissioner of the City of London Police

**For Information**  
(Pages 13 - 14)

6. **Q2 STOP AND SEARCH DATA - 2020-21**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 15 - 36)

7. **STOP AND SEARCH DATA BREAKDOWN**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 37 - 38)

8. **USE OF ALGORITHMS AND AI WITHIN CITY OF LONDON POLICE**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 39 - 78)

9. **EQUALITY AND INCLUSION STRATEGY UPDATE**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 79 - 104)

10. **INTEGRITY AND CODE OF ETHICS UPDATE**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 105 - 130)
11. **IOPC REVIEW INTO STOP AND SEARCH, REPORT ON THE METROPOLITAN POLICE SERVICE**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 131 - 140)
12. **ACTION PLAN: TRANSPARENCY, ACCOUNTABILITY AND TRUST IN POLICING**
- For Information**  
(Pages 141 - 188)
13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
14. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
15. **EXCLUSION OF THE PUBLIC**  
**MOTION** – that under Section 100 (A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
- For Decision**
16. **NON-PUBLIC MINUTES**  
To agree the non-public minutes of the meeting held on 14th September.
- For Decision**  
(Pages 189 - 192)
17. **NON-PUBLIC REFERENCES**  
Joint report of the Town Clerk and Commissioner.
- For Information**  
(Pages 193 - 194)
18. **CITY OF LONDON POLICE ETHICAL PARTNERSHIPS**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 195 - 206)

19. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 - 1ST JULY 2020 – 30TH SEPT 2020**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 207 - 222)
20. **PROFESSIONAL STANDARDS DIRECTORATE CASES**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 223 - 226)
- a) Cases assessed as conduct or performance issue - case to answer / upheld (Pages 227 - 230)
  - b) Cases assessed as not conduct or performance issue - no case to answer / not upheld (Pages 231 - 236)
  - c) Local Resolution (Pages 237 - 244)
  - d) Death or Serious Injury (Pages 245 - 248)
  - e) Cases dealt with under Complaint and Conduct Regulations 2019 (Pages 249 - 268)
21. **ACTION FRAUD STATISTICS – QUARTER 2 – 1ST JULY 2020 – 30TH SEPT 2020**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 269 - 276)
22. **NFIB CASES ASSESSMENT PROCESS**  
Oral Update
- For Information**
23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
24. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE CITY OF  
LONDON POLICE AUTHORITY BOARD  
Monday, 14 September 2020**

Minutes of the meeting of the Professional Standards and Integrity Committee of the  
City of London Police Authority Board held via Microsoft Teams on Monday, 14  
September 2020 at 11.00 am

**Present**

**Members:**

Alderman Alison Gowman (Chair)  
Douglas Barrow  
Nicholas Bensted-Smith  
Tijs Broeke  
Mary Durcan  
Alderman Emma Edhem  
Deborah Oliver

**Observing:**

Natasha Lloyd-Owen

**City of London Police Authority:**

Oliver Bolton	- Deputy Head of Police Authority Team
Rachael Waldron	- Compliance Lead
Alistair MacLellan	- Town Clerk's Department
Richard Holt	- Town Clerk's Department
Ellen Wentworth	- Chamberlain's Department
Tarjinder Phull	- Comptroller and City Solicitor's Department

**City of London Police Force:**

Alistair Sutherland	- Assistant Commissioner
Angie Rogers	- Head of Professional Standards Directorate
Richard Galvin	- Police Inspector

**1. APOLOGIES**

Apologies were received from Caroline Addy and Deputy James Thomson.

The Chair welcomed the appointment of Mary Durcan and Alderman Greg Jones to the Committee, and placed on record the Committee's thanks to Mia Campbell, who had stepped down as external Member.

**2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN  
RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

**3. TERMS OF REFERENCE**

**RESOLVED**, that the terms of reference of the Committee as agreed by the City of London Police Authority Board at its 29 July 2020 meeting be received.

4. **MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 29 November 2019 be approved.

5. **REFERENCES**

Members considered a late joint report of the Town Clerk and Commissioner regarding references and the following points were made.

**8/2019/P – Force Communications Plan to be reviewed to reassure public regarding Stop and Search**

- The Assistant Commissioner noted that both the Force internal and external communications plans incorporated data on the use of stop and search. Moreover there was a report later on the agenda that gave a breakdown of stop and search statistics.
- A Member Observer noted that a quarterly public report on the Force website noted that there was a technical error preventing the display of data with regards to ethnicity. The Assistant Commissioner committed to rectifying the issue in time for the November 2020 meeting of the Committee.
- Members noted that the reference had arisen as a means to provide public reassurance on the use of stop and search, and that it could now be closed.

**12/2020/P – Response on potential use of predictive policing methods**

- The Assistant Commissioner noted that the Force did not use predictive policing or artificial intelligence at present and there would be consultation with the Authority in advance of those methods being adopted. Members were asked to note, nevertheless, that there was some discussion nationally regarding the ethics of predictive policing.
- A Member highlighted a 11 August 2020 decision by the Court of Appeal against South Wales Police's use of automated facial recognition and encouraged the Force to ensure issues within that judgement be factored into the decision making process towards adoption of any predictive policing methods.
- Members agreed that the reference could be closed.

**14/2019/P – Future meeting dates of London Police Challenge Forum**

- In response to a question, the Assistant Commissioner replied that the Forum was a joint meeting between London Forces and partners, which the Force's Head of Strategic Development led on. Meetings of the

Forum had been disrupted by COVID-19 and when further information was available this would be provided to the Committee.

**17/2019/P – New Review Panel process to be reviewed after three months**

- The Chair noted that the new process was in operation, with an update report later on the agenda. Members agreed that, due to COVID-19, the review should be deferred until January 2021.

**18/19/2019/P – File failure rate and analysis to be provided outside of meeting**

- The Town Clerk noted that a detailed report on this issue had been submitted to the inquorate March 2020 meeting. Members agreed that the report be made available on request, alongside 1:1 debriefs by the Force, and that the reference could be closed.

**20/2019/P – Ethical Economic Partnerships Report**

- The Deputy Head of the Police Authority noted that a report at the October 2020 meeting of the City of London Police Authority Board would go into some detail on ethical economic partnerships that the Force was involved in. the report would then come to the November 2020 meetings of this Committee.
- In response to a request, the Deputy Head of the Police Authority committed to reviewing the report and feeding back on whether it included an overview of the process through which partnerships were agreed.

**1/2020/P – London Police Challenge Forum Case Studies**

- The Chair noted that the Forum had not been meeting due to COVID-19 and therefore there was no update under this reference.

**2/2020/P – Victim Satisfaction Survey**

- The Chair noted the next survey would be conducted in November 2020 with a report to this Committee in early 2021.

**3/2020/P – Statistics on temporary promotions at all levels of Force**

- Members noted that this reference would be dealt with at the November 2020 meeting.

**RESOLVED**, that the report be received.

**6. COVID-19 FIXED PENALTY NOTICES**

Members considered a report of the Commissioner regarding COVID-19 Fixed Penalty Notices (FPNs).

- The Chair noted that the figure on FPNs given at the Court of Common Council meeting in early September 2020 was different, in the number of FPNs issued had been revised down to 19. However since the report had been produced a further 8 FPNs had been issued during Extinction Rebellion protests in the City, all to white males. In total this meant 27 FPNs had been issued.
- A Member requested that the way in which data was presented be reviewed. It was not clear to him whether the data referred to Force officers, but acting wider than the City area. A more detailed breakdown on officer-based and geographical-based data would be welcome.
- A Member welcomed the data, noting that it showed interesting patterns emerging. Specifically it appeared that outside of the City it was more likely for BAME persons to be issued fines, and the Member queried why this was the case. Moreover if both fines and warning figures were combined that BAME were typically given fines whereas older white persons typically received a warning. It would be interesting to have some context on why this might be the case.
- The Assistant Commissioner replied that the demographics of fines and warnings reflected areas of London where the Force was typically deployed in support of partners. For example the boroughs surrounding the City were very diverse and it was therefore more likely to encounter BAME persons. On the issue of fines versus warnings, each encounter with a member of the public was a clear phased process commencing with a request for compliance, with progression through the phases dependent on how the individual reacted.
- A Member queried whether interactions with younger BAME persons were escalating in such a way that prompted fines being issued and noted that the Force and Authority needed to reflect on why this might be the case.
- The Assistant Commissioner noted that there was work ongoing in both the Force, Metropolitan Police and British Transport Police on how Forces engaged and educated the various communities they encountered. The Assistant Commissioner was confident that the Force's approach to COVID FPNs was proportionate.
- In response to a question, the Assistant Commissioner confirmed that the COVID FPNs issued during Extinction Rebellion protests in the City were due to breach of COVID guidelines, and not to counter the individuals' right to protest.
- The Chair highlighted the National Police Chiefs' Council report *Policing the Pandemic* and suggested that the Town Clerk circulate it to Members outside of the meeting. The report confirmed a disparity in the issuing of FPNs to BAME persons compared to other ethnic groups, although NPCC statistics were compiled differently to Force statistics.



- In response to a question the Assistant Commissioner confirmed that Body Worn Video (BWV) was used during encounters that could lead to the issuing of a COVID FPN or warning. The BWV of Force officers recorded passively and therefore captured the prior 30 seconds to any occasion when the officer commenced recording an encounter.
- In response to a question, the Deputy Head of the Police Authority Team confirmed that the 8 COVID FPNs issued recently were the only FPNs issued since the figures detailed within the report on the agenda, which dated to May 2020.

**RESOLVED**, that the report be received.

**7. STOP AND SEARCH QUARTER 1 2020/21 - 1 APRIL 2020 - 30 JUNE 2020**

Members considered a report of the Commissioner regarding the Stop and Search Quarter 1 2020/21 – 1 April 2020 – 30 June 2020 and the following points were made.

- The Chair noted that the Force's 35% positive outcome rate was significantly more than the national average of 21%, which reflected the fact the Force had worked hard to ensure there were strong grounds for stop and search tactics being used.
- The Assistant Commissioner noted that the conversion rate for Metropolitan Police stop and search tactics during 2019/20 was 15%.
- In response to questions, the Assistant Commissioner replied that of 584 stop and searches, 235 had taken place outside of the City, and agreed to review whether a breakdown in terms of age and ethnicity could be provided for the 235 stops outside the City.
- In response to a question, the Assistant Commissioner confirmed that the Force stop and search statistics incorporated stop and searches conducted by Op Servator trained officers. Not all officers were Servator-trained and the Force was looking at how Servator stop and search techniques could be rolled out among the Force as a whole. The Force's Transform programme involved a consideration of how Servator numbers could be uplifted. Her Majesty's Inspector of Constabulary, Fire and Rescue Services had noted that the Servator officers actually had a slightly higher failure rate when completing stop and search paperwork, which was being reviewed.
- The Assistant Commissioner, for the benefit of any members of the public watching the meeting, noted that Servator was a Force initiative dating to 2014 that used behavioural analysis as part of intelligence-led deployments to crime hot spots and areas deemed at high risk of terror attack. It involved both overt and covert deployment of officers, and public communication via leafleting and social media. Servator had been successfully rolled out to 27 Forces nationally, as well as giving greater focus to officers and improving stop and search outcomes.

- In response to a question, the Assistant Commissioner replied that over the past eight to nine years the positive outcome rate from stop and search had increased significantly, with more scrutiny, focus, tasking and intelligence-led deployments. Over the same period the number of stop and searches conducted had declined. Stop and search was not an exact science, but it was a tactic that was applied in response to intelligence provided by victims of crime and members of the public. There would of course be occasions when officers would come across suspicious behaviour during the course of routine deployment that would require engagement that could result in a stop and search.
- An Observing Member was heard, noting that she hoped that officers underwent de-escalation training for when they engaged with young people, given the statistics underpinning both COVID FPNs and stop and search. Secondly, there appeared to be differing approaches to statistics within the quarterly report varying between self-identified ethnicity and perceived ethnicity, which could give rise to misleading statistics. There was also a differing approach to using either graphic presentation of data versus narrative descriptions where a direct comparison of like with like would perhaps be more helpful. Thirdly, it would be helpful if data could be presented in a more qualitative way e.g. breaking drug stops down into whether the arrest was for Class A, Class B, and either supply or possession. Lastly, the Member queried how many of the 106 drug stops conducted were done for the reason that cannabis could be smelled, which was bad practice.
- The Chair noted that these points and queries were quite detailed and might benefit from a written response outside of the meeting but invited the Force to provide an initial response at the meeting.
- The Assistant Commissioner agreed to review how best data could be broken down and presented in reporting. In terms of drug stops, the Force did have a stated priority to disrupt the supply of Class A drugs and so officers were tasked accordingly. HMICFRS had assessed 92% of Force stop submissions to be of a high standard, with the reasons for the remaining 8% under review and often for technical reasons. Officers were trained to engage with young persons and moreover in addressing unconscious bias. The Force also convened an independent Stop and Search Scrutiny Group. Lastly, Members were welcome to engage with the Assistant Commissioner directly on stop and search matters although were requested to provide email feedback in the first instance.
- The Town Clerk agreed to ensure the written response to the Member's comments and questions were published in the public domain. The Assistant Commissioner added that the Force's independent Stop and Search Scrutiny Group would also be briefed on the points raised.

**RESOLVED**, that the report be received.

## 8. **SUMMARY OF RECENT REVIEWS OF POLICE COMPLAINTS**

Members considered a report of the Town Clerk providing a summary of recent reviews of Police complaints and the following points were made.

- The Chair noted that a review of the new process had been planned after three months of operation but, due to COVID, would now take place in January 2021. The Review Panel was meeting on a monthly basis and training would be made available to Members.
- The Deputy Head of Police Authority Board highlighted that there was a bias towards reviews of complaints relating to Action Fraud, and not many complaints regarding the Force's core business, which was positive. Of the complaints made regarding Action Fraud, the Review Panel was seeing about a third. The Review Panel generally felt that the Force could make better explanations of the process through which cases were referred on for investigation or not, and that explanations should be presented in layman's terms as far as was possible. Complaint responses were often a comprehensive end to end summary of process, but with scant detail on the key areas concerning the complainant. The Authority would welcome the opportunity to work with the Force to improve this.
- A Member noted he was present at the June 2020 Review Panel and requested the record be updated accordingly.
- The Chair noted that she was concerned that feedback from the Force had not been received on the recommendations put to the Force by the Panel, particularly recommendations arising from the July 2020 panel meeting. This was particularly important as the new process was designed to foster a learning culture rather than one of blame – lack of response from the Force suggested that the learning culture had yet to be embraced. Lastly, a Member of the Panel had flagged the potential GDPR issue around the use of algorithms to analyse crime reports and refer them on for investigation. Timely feedback from the Force on Panel recommendations would be welcome going forward.
- The Head of the Professional Standards Directorate noted that the Directorate had only recently taken on responsibility for managing Action Fraud complaints and recruited a new member of staff for that purpose. Panel recommendations were taken seriously and the Directorate was working with both Action Fraud and the National Fraud Intelligence Bureau to make improvements. The new member of staff would attend the November 2020 meeting to brief Members on their role.
- The Chair requested a report at a future meeting outlining other avenues of appeal open to complainants e.g. the Ombudsman.

**RESOLVED**, that the report be received.

9. **INTEGRITY AND CODE OF ETHICS UPDATE**

Members considered an update report of the Commissioner regarding Integrity and Code of Ethics. The Chair noted that a version of the report had been considered by the City of London Police Authority Board at its July 2020 meeting.

**RESOLVED**, that the report be received.

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

**Recruitment of External Member**

- In response to a question regarding the process of recruiting an external Member of the Committee, the Town Clerk noted that the intention was to advertise and recruit ahead of the Committee's November 2020 meeting, although this would be offset by wider Authority governance work on drawing up Member role profiles and job descriptions. The process would also be aligned with the work of the City's Tackling Racism Working Party.
- A Member encouraged the Authority to be as creative as possible in advertising the vacancy and cited the example of recruiting young alumni on to Local Governing Bodies of academies in the City of London Academies Trust. The Member suggested that the Committee may benefit from hearing from a speaker from an independent organisation on this issue. Moreover greater use, particularly for recruiting City of London Police Authority Board external Members, could be made of professional head hunters.

**External Scrutiny**

- In response to a question, the Deputy Head of the Police Authority Team noted that the Community Scrutiny Group and Independent Advisory Group had been amalgamated to form the Independent Advisory and Scrutiny Group (IASG) in December 2019. The new group arrangements were working well, and the Chairman of the City of London Police Authority Board would be attending a meeting of the IASG and vice versa. The Chair of the Professional Standards and Integrity Committee would also be attending a meeting of the IASG to better understand how the work of the two bodies could align. The reports on the work of the IASG that were submitted to the City of London Police Authority Board could also be submitted to the Committee for information.
- The Deputy Head of the Police Authority Team confirmed that the Independent Custody Visitors' Scheme (ICV) was Authority-led whereas the IASG was Force-led.

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**  
There were no questions.
12. **EXCLUSION OF THE PUBLIC**  
**RESOLVED**, that under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
13. **NON-PUBLIC MINUTES**  
**RESOLVED**, that the non-public minutes of the meeting held on 29 November 2019 be approved as a correct record.
14. **NOTE OF INQUORATE MEETING - 2 MARCH 2020**  
**RESOLVED**, that the non-public note of the inquorate meeting held on 2 March 2020 be received.
15. **NON-PUBLIC REFERENCES**  
Members considered a late joint report of the Town Clerk and Commissioner regarding non-public references.
16. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
Members considered a report of the Comptroller and City Solicitor regarding Employment Tribunal and Other Legal Cases.
17. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 1 - 1 APRIL 2020-30 JUNE 2020**  
Members considered a report of the Commissioner regarding Professional Standards Statistics – Quarter 1 – 1 April 2020 – 30 June 2020.
18. **PROFESSIONAL STANDARDS DIRECTORATE CASES**  
Members considered a report of the Commissioner regarding Professional Standards Directorate Cases.
  - 18.1 **No Case to Answer / Not Upheld**  
Members considered cases with no case to answer or were not upheld.
  - 18.2 **Local Resolution**  
Members considered cases dealt with by local resolution.
  - 18.3 **Death or Serious Injury**  
Members considered cases involving death or serious injury.
  - 18.4 **Cases dealt with under Complaint and Conduct Regulations 2019**  
Members considered cases dealt with under Complaint and Conduct Regulations 2019.

19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no non-public questions.

20. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There was no other business.

**The meeting ended at 12.58 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE  
**CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY**

**PUBLIC OUTSTANDING REFERENCES**

14/2019/P	18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update	Future meeting dates of London Police Challenge Forum to be provided to the Committee.	Head of Strategic Development	
17/2019/P	29 November 2019 Item 5 – Police Authority Process for Handling Complaints Appeals Process	New Review Panel Process to be reviewed after three months of operation.	Town Clerk	<b>IN PROGRESS</b> Review to be conducted January 2021
20/2019/P	29 November 2019 Item 10(a) – Ethical Economic Partnerships Policy	Ethical Economic Partnerships Policy to be reviewed by Professional Standards and Integrity Committee after one year of operation.	Police Authority Team	<b>IN PROGRESS</b> Due November 2020
1/2020/P	2 March 2020 Item 5 Integrity Dashboard and Code of Ethics Update	Case studies arising from London Police Challenge Forum Meetings to be circulated to Committee	Head of Strategic Development	<b>IN PROGRESS</b> No update at present
2/2020/P	2 March 2020 Item 5 Integrity Dashboard and Code of Ethics Update	Committee to be advised when next Victim Satisfaction Survey will be conducted	Head of Professional Standards	<b>IN PROGRESS</b> Survey to be conducted in November 2020 and report to Committee in early 2021.

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE  
**CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY**

3/2020/P	2 March 2020 Item 5 Integrity Dashboard and Code of Ethics Update	Force Human Resources to provide report to June 2020 meeting on statistics of temporary promotions at all levels of Force	Assistant Commissioner	<b>IN PROGRESS</b> Due November 2020
4/2020/P	14 September 2020 COVID-19 FPNs	NPCC <i>Policing the Pandemic</i> to be circulated to the Committee	Town Clerk	
5/2020/P	14 September 2020 Stop and Search Q1 2020/21	Force to review provision of breakdown by ethnicity/age of 235 stops outside City	Assistant Commissioner	
6/2020/P	14 September 2020 Stop and Search Q1 2020/21	Written response to be prepared addressing issues raised by observing Member	Assistant Commissioner	
7/2020/P	14 September 2020 Summary of Reviews of Police Complaints	Action Fraud Complaints Manager to attend November 2020 Committee	Head of Professional Standards	
8/2020/P	14 September 2020 Summary of Reviews of Police Complaints	Report on other avenues of appeal to be submitted to Committee	Police Authority Team	
9/2020/P	14 September 2020 Questions – Recruitment of External Member	Recruitment process to be reviewed to ensure diverse pool of experienced candidates is identified.	Police Authority Team	
10/2020/P	14 September 2020 Questions – External Scrutiny	IASG reports to be submitted to PSI Committee	Police Authority Team	

**CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY**



**Officers on Acting and Temporary Promotion at 30/11/2020**

<b>Rank/ Grade</b>	<b>Total FTE (incl. Secondments)</b>	<b>Total Headcount (incl. Secondments)</b>	<b>Officers on Secondment</b>
A/Det Ch Insp	2	2	
A/Ch Insp	1	1	
A/Det Insp	5	5	
A/Insp	6	6	
A/Det Sgt	9	9	
A/Sgt	19	19	
T/Cmndr	3	3	1
T/Det Supt	1	1	
T/Supt	3	3	1
T/Det Ch Insp	4	4	
T/Ch Insp	2	2	
T/Det Insp	4.78	5	1
T/Insp	3	3	
T/Det Sgt	9.92	10	2
T/Sgt	4	4	
<b>Grand Total</b>	<b>74.7</b>	<b>75</b>	<b>5</b>

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# Agenda Item 6

<b>Committee(s):</b> Police Professional Standards and Integrity Committee	<b>Date(s):</b> 26 <sup>th</sup> November 2020
<b>Subject:</b> Q2 Stop and Search Data – 2020-21	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 81-20	<b>For Information</b>
<b>Report author:</b> CoLP Performance Information Unit	

## Summary

At your May Police Authority Board as part of the new governance and scrutiny arrangements, the Force was directed to submit regular quarterly reports to the Professional Standards and Integrity (PSI) Committee on Stop and Search. The first of these reports, detailing Q1 data was submitted to your September PSI Committee.

The attached report details the Q2 data, 1<sup>st</sup> July- 30<sup>th</sup> September 2020 and is presented for information.

## Recommendation

It is recommended that Members note the report

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Performance Information Unit

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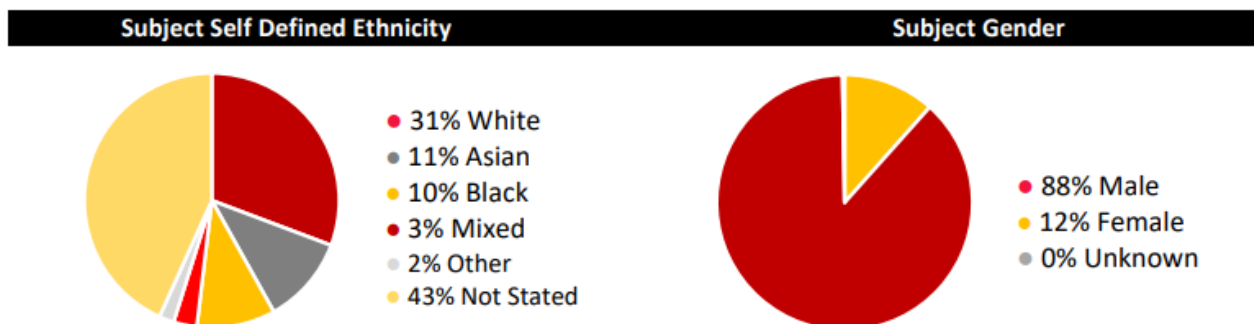
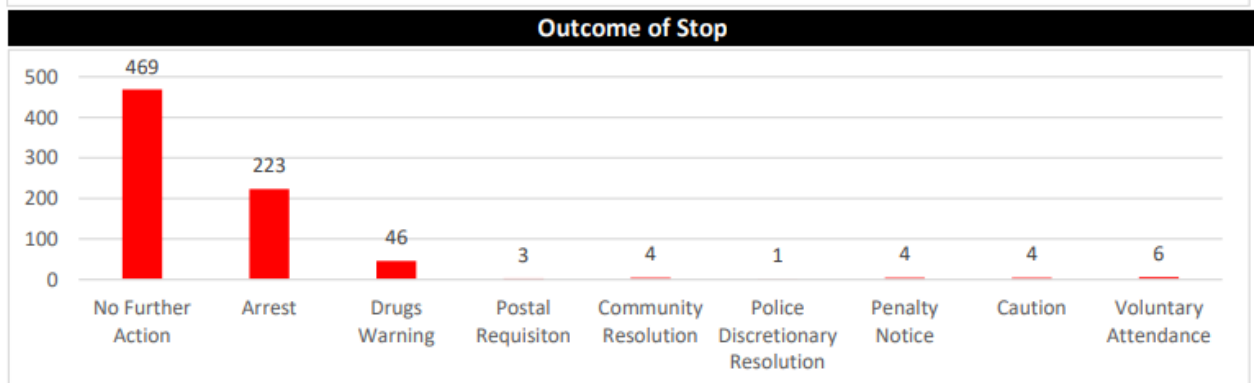
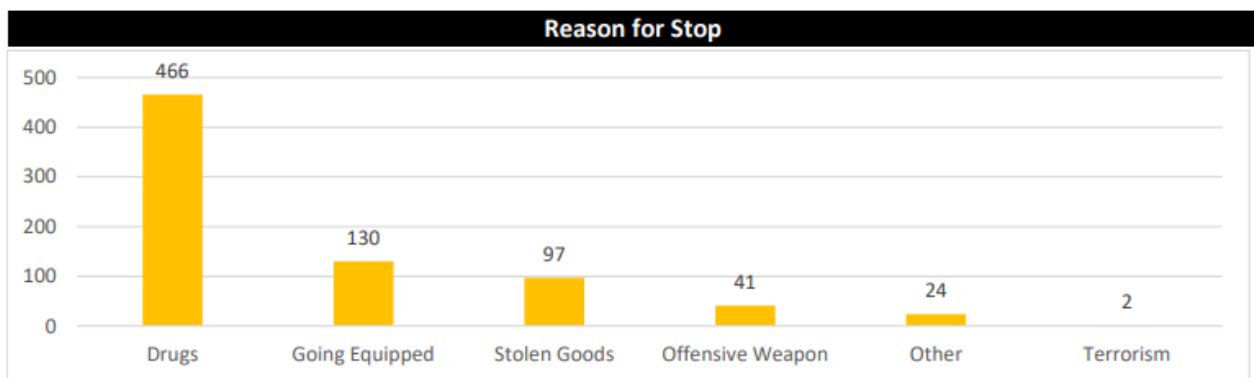
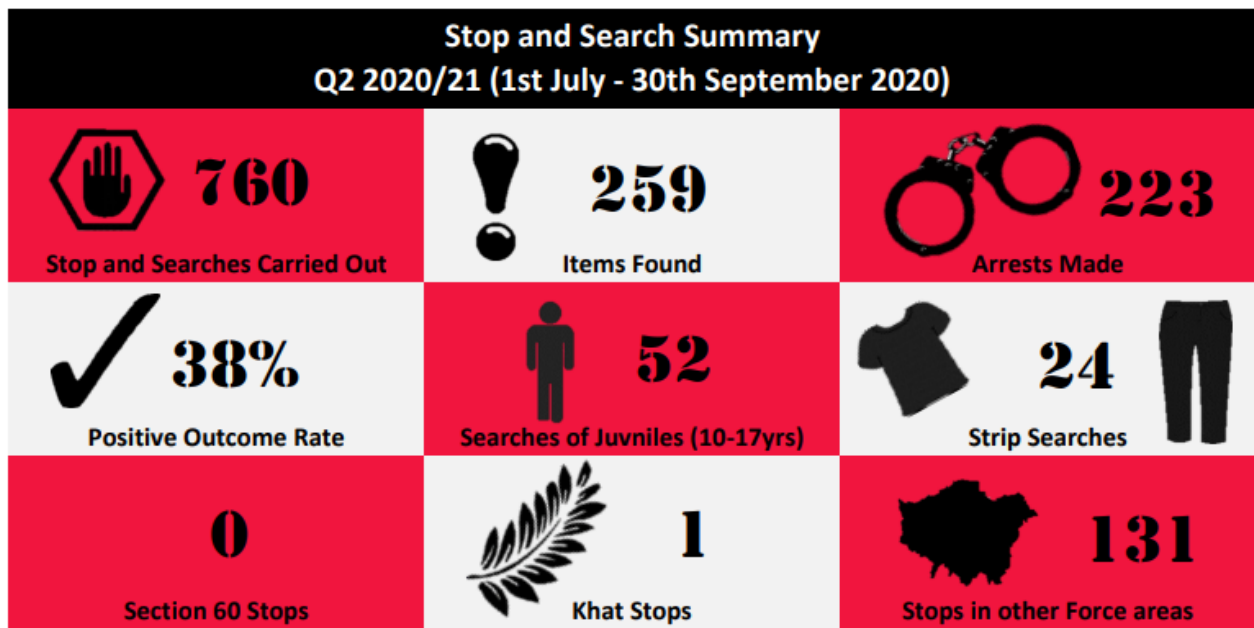
# **Stop and Search**

## **Quarter 2 2020/21**

### **1<sup>st</sup> July – 30<sup>th</sup> September 2020**

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<b>Compiled by:</b>	PIU
<b>Reviewed by:</b>	Performance Analysis Manger
<b>Directorate:</b>	I&I
<b>Date completed:</b>	30/10/2020

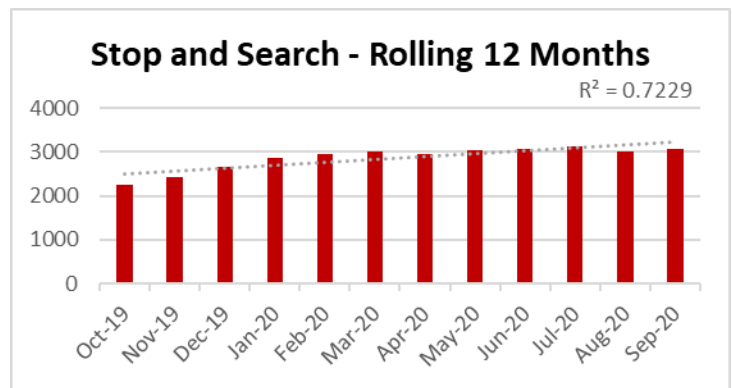
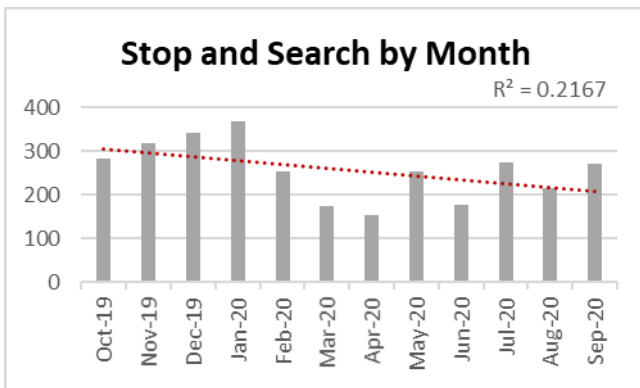


# Stop and Search – Quarter 2 20/21

## 1.1 Key Findings

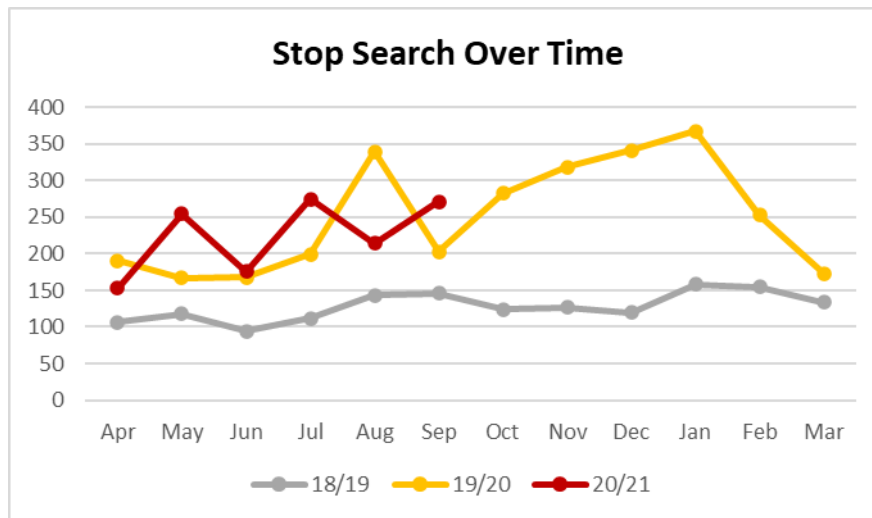
- There has been an increase in the number of searches carried out this quarter (+30%, n=+176) although levels are still lower than they were pre-Coronavirus.
- On average 253 stops were carried out each month this quarter, just below the average for the last 12 months of 256 stops a month.
- When looking at the last couple of years levels for this quarter remain above where they were in 2018 and at somewhat similar levels to 2019. Without Notting Hill Carnival we did not see a spike in August this year.
- Searching for drugs continues to be the main reason stops are made. There was one stop relating to Khat possession this quarter which resulted in a no further action outcome.
- Most stops took place on Friday or Saturday, the peak times this quarter were Thursday and Friday between 15:00-17:00.
- The number of stops taking place on Metropolitan Police ground has returned to a more expected level of 17% (n=131).
- The most common locations of all stops were Bishopsgate, Middlesex Street, Cheapside and Blackfriars Bridge. Notable premises were the NCP Aldersgate car park and Tesco Metro on Bishopsgate.
- The group most commonly stopped and searched in terms of perceived and self-defined ethnicity is white individuals.
- Levels of disproportionality have decreased slightly across this quarter from 1.9 to 1.6 for Black individuals and from 1.3 to 1.2 for Asian individuals, the level for other ethnicities has remained the same.
- Most people stopped are between the ages of 18 and 24 years old.
- There were 52 stops of under 18s this quarter with most stops related to drugs. The youngest person stopped was a 13 year-old white male in relation to potential drugs offences. The arrest rate for juvenile stops this quarter is 13%.
- There were 21 full strip searches this quarter, objects were found in more than half of them and 13 arrests were made.
- The find rate this quarter is 34% and the arrest rate is 29%.
- The overall positive outcome rate is 38%.

## 1.2 Monthly Breakdown



There has been an increase in the number of searches carried out this quarter after numbers reached their lowest point last quarter. The rolling 12 month graph however indicates that levels are on the whole still showing an increasing trend, depending on what happens in the coming months this may begin to show a decrease or plateau to a steady level.

On average over the last 12 months there have been 256 stops a month with this quarter averaging 253 a month, levels were at their lowest all year in April when people were abiding by lockdown rules and mostly staying home. While levels have been higher than last quarter in the last three months they have not reached pre Coronavirus levels probably because activity in the City has not returned to what was previously normal with many companies continuing to have their staff work from home.



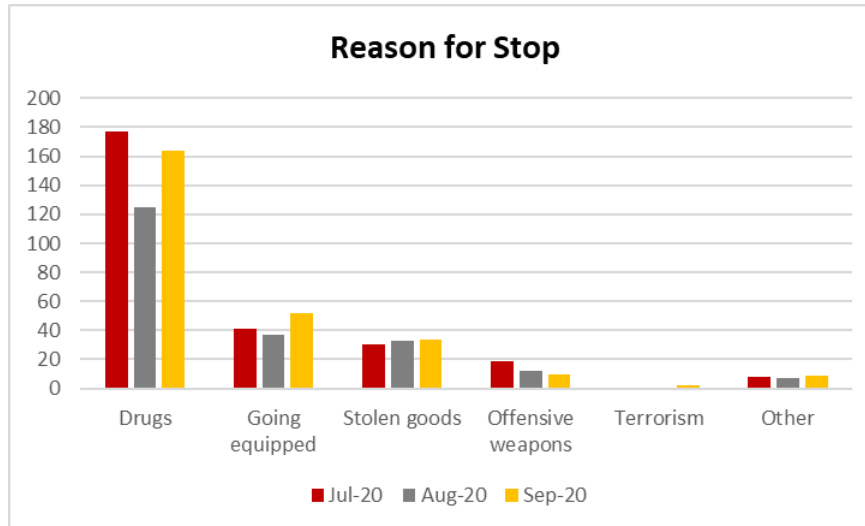
When looking at the last couple of years levels for this quarter remain above where they were in 2018 and at somewhat similar levels to 2019. Without Notting Hill Carnival we did not see the same spike in August as last year, there is no discernible seasonal trends displayed on the graph so it is hard to predict what the coming months may hold.



## 2.1 Reason for Stop

The most common legal basis for searches this quarter was Misuse of Drugs Act (61%, n=466) followed by PACE (38%, n=286). The Firearms Act s47 accounted for less than 1% of stops, three in number. There were no Section 60 stops in this period.

The reasons for the stops this quarter are shown in the below graph;



Drug stops continue to be the most common as observed in previous quarters. Most stops related to cannabis and a smaller number for other controlled drugs (n=314 to n=151 respectively). There was one stop relating to Khat possession this quarter which resulted in a no further action outcome.

Under the offensive weapons category there were 19 searches for a bladed article and 17 for a general offensive weapon. Three of the bladed article stops resulted in an arrest, although these were not related to finding a bladed weapon. There were two firearms stops in July and another two in August all resulted in no further action being taken.

The proportion of Going Equipped and Stolen Goods searches has increased slightly from last quarter from 28% to 30% (n=237) this is likely related to increased opportunity for such crime with a wider range of shops being open for business.

There were two terrorism stops this quarter relating to two separate incidents of individuals filming and taking pictures at key locations no further evidence was found on either individual and they were both released with no further action.

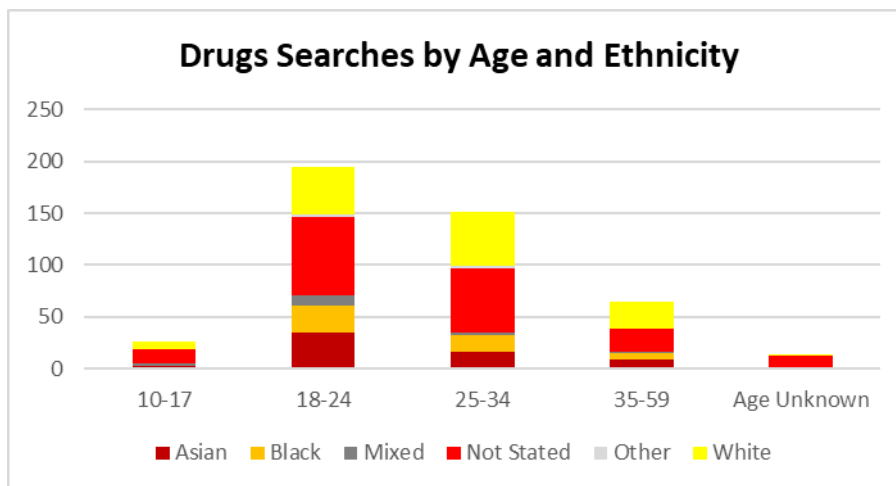
## 2.2 Reason for Stop – Drugs Searches

Drugs searches most commonly took place on Fridays and Saturdays this quarter, with particularly high levels of activity on Saturday afternoons between 15:00 and 18:00. Just over one in five of drug stops carried out this quarter took place on Metropolitan Police ground (22%, n=103).

Breaking the categories of stops down 314 related to Cannabis (67%) and 152 (32%) to other drugs, 151 searches (32%) involved both persons and vehicles.

The find rate for drugs searches for this quarter is 36% with 166 out of 466 searches finding something, in 149 cases this was the object searched for and in 17 a different object. There were 133 arrests made as a result of drugs stops (29%), 44 drugs warnings were issued, 3 cautions, 3 postal requisitions, 4 penalty notices and 6 voluntary attendances. The overall positive outcome rate for drug searches is 41% (n=193).

Common repeat locations for drugs related stops this quarter were Bishopsgate, Middlesex Street and Blackfriars Bridge.



The graph above shows the demographic breakdown of individuals stopped with regards to drugs.

They were mainly male (88%, n=410), did not state their ethnicity (39%, n=184) and between 18 and 24 years old (42%, n=195). For those who did not state their ethnicity they were most often perceived to be White (39%, n=71). When perceived ethnicities for those who did not state are added to the self-defined ethnicities the most common ethnic group stopped for drugs is white individuals (44%, n=203).

Aside from these searches there were seventeen further vehicle only searches.

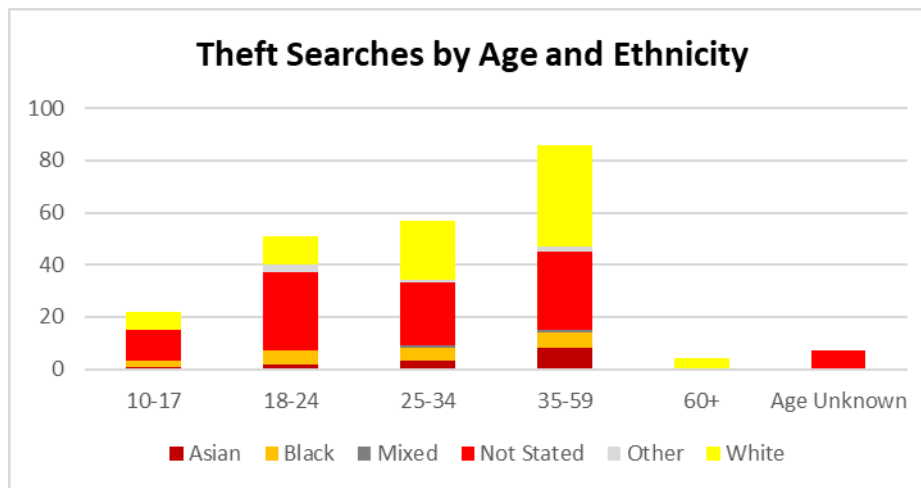
## 2.3 Reason for Stop – Going Equipped and Stolen Goods

Stops relating to going equipped or stolen goods most commonly took place on Wednesdays, peaking on both Wednesday and Thursday afternoons between 14:00-18:00.

The find rate for theft related searches this quarter is 35% with 65 searches finding the object(s) they were searching for and a further 15 finding other objects.

There were 76 arrests resulting from these stops (33%), when other outcomes are included the positive outcome rate is 37% this includes 4 community resolutions, 1 caution, 2 drugs warnings and 1 police discretionary resolution.

The most common street locations for these searches this quarter were Cheapside, Bishopsgate, and Gracechurch Street. Tesco Metro on Bishopsgate was a top repeat premises.



The graph above shows the demographic breakdown of individuals stopped with regards to going equipped or stolen property.

They were mainly male (81%, n=185), did not state their ethnicity (45%, n=103) and between 35 and 59 years old (38%, n=86). For those who did not state their ethnicity they were most often perceived to be white (53%, n=55). Looking at self-defined and perceived ethnicities together shows that white people were most commonly stopped in relation to theft (61%, n=139).

There were no vehicle only searches for theft this quarter.

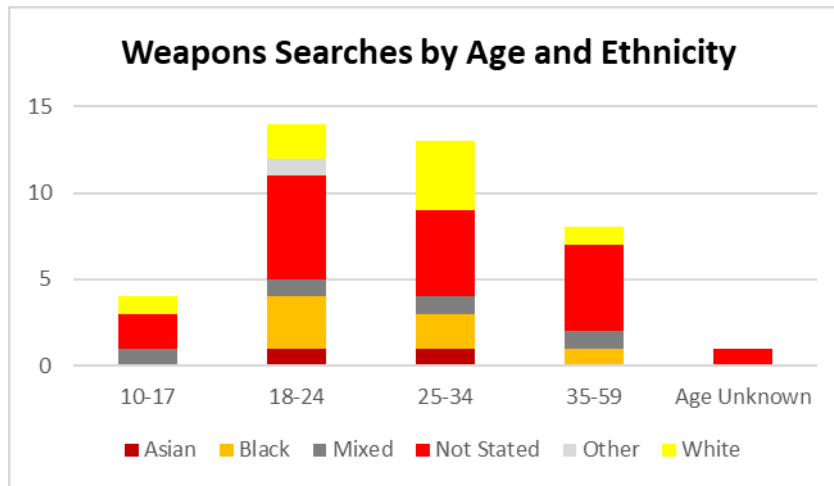
## 2.4 Reason for Stop – Offensive Weapons

Stops relating to weapons (bladed, offensive or firearms) most commonly took place on Saturdays this quarter, with a spike on Monday evening between 22:00-22:59.

The find rate for weapons related searches this quarter is 17% with 4 searches finding the object(s) they were searching for and a further 3 finding other objects. No items were recovered as all subjects were found to have legitimate reasons for possession of objects e.g. builders' tools.

There were 6 arrests resulting from weapons stops this quarter (15%) and no other positive outcomes.

The most common street locations for these searches this quarter were Bishopsgate and Aldersgate.



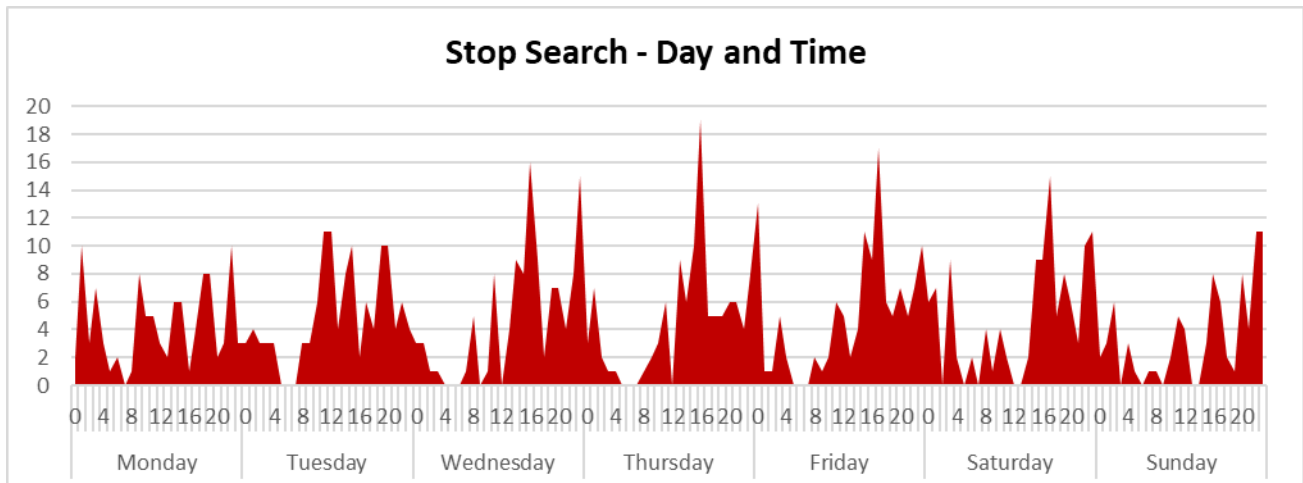
The graph above shows the demographic breakdown of individuals stopped with regards to weapons.

They were all males who mainly did not state their ethnicity (46%, n=19) and between 18 and 24 years old (34%, n=14). For those who did not state their ethnicity they were most often perceived to be Black (53%, n=10), when this is added to self-defined ethnicities people of Black ethnicities were most commonly stopped (39%, n=16).

There was one vehicle only stop in relation to weapons this quarter.

## 2.5 Time and Location of Stop

Most stops took place on Friday or Saturday, the peak times this quarter were Thursday and Friday between 15:00-17:00. Levels are noticeably lower between 04:00-11:00 most days and Sunday and Monday are the quietest days overall.

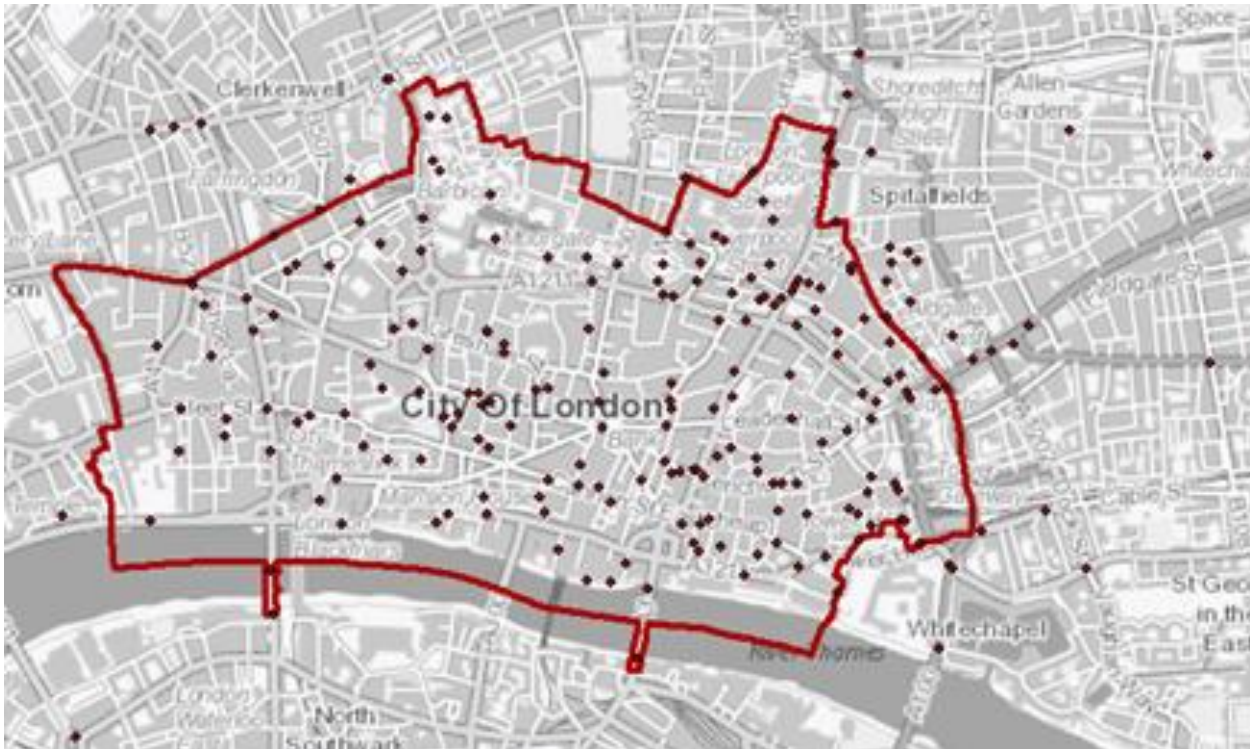
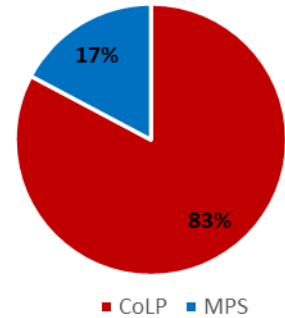


For the current period a 17% of stops took place on Metropolitan Police ground (n=131) which is a more expected level after rising to 40% last quarter.

The most common locations of all stops were Bishopsgate, Middlesex Street, Cheapside and Blackfriars Bridge. All the top 10 locations this quarter are street records apart from the NCP car park at Aldersgate.

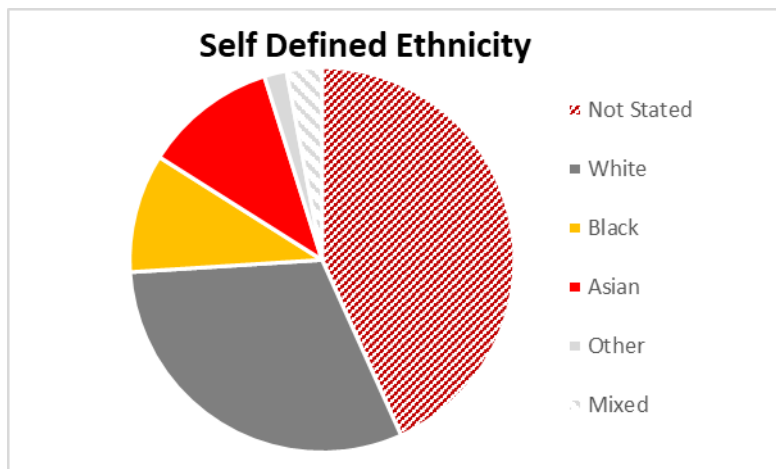
Locations of stops in and around the City can be seen depicted on the map below;

**Force Area of Stop**



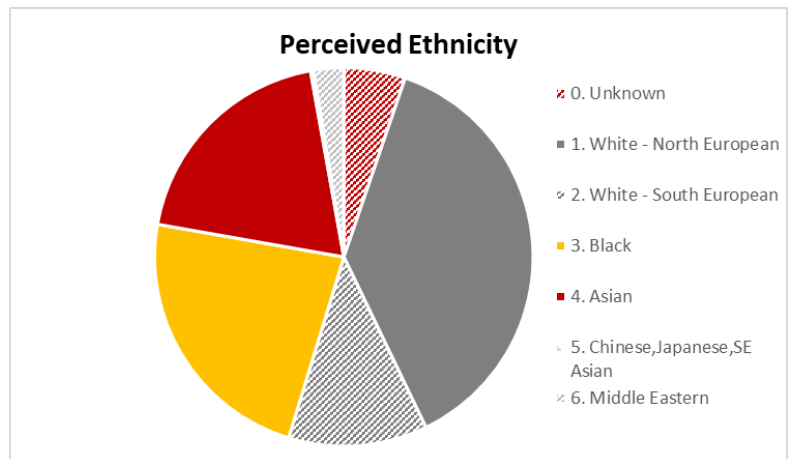
### 3.1 Ethnicity

The group most commonly stopped and searched in terms of perceived ethnicity is White – North European individuals (37%, n=279), this is similar for self-defined ethnicity with white individuals accounting for 30% of searches (n=228).



In terms of self-defined ethnicity the largest group is those who did not wish to state their ethnicity (42%, n=321). When compared to their perceived ethnicity the majority of these individuals were perceived to be white (42%, n=135) or black (27%, n=86). The majority of people who chose not to state their ethnicity are between 18 and 24 years of age (36%, n=114).

The biggest discrepancy between self-defined and perceived ethnicity is seen with white individuals with 63% of people stopped perceived to be white but only 39% defining themselves as such. The gap for black individuals is 16%, 29% were perceived to be black but only 13% defined themselves as such. These gaps are mainly due to these individuals choosing not to state their own ethnicity on the stop and search form.



Comparisons across the two recorded ethnicities are however somewhat difficult as categories do not match exactly. For example a number of individuals perceived as black (n=12) or white (n=3) self-defined as mixed ethnicity but this is not an option the officer can select for perceived ethnicity.

### 3.2 Disproportionality

#### 3.2.1 What is disproportionality?

When the Equality and Human Rights Commission (EHRC) published their Stop and Think report in 2010 looking in to the use of stop search by UK police forces they used two measures to assess fairness in terms of ethnicity; a disproportionality ratio and a count of excess stops.

Since then disproportionality has become a key measure for forces when examining the use of stop and search. The ratio looks at how much more likely black and Asian people are to be searched than white people based on their prevalence in the local population. Calculating the figure in this way allows for comparisons between forces of different sizes and ethnic diversity.

### 3.2.2 Disproportionality and the City

Due to the relatively small resident population compared to the large transient one in the City it is not easy to address questions of disproportionality. Traditionally this is calculated using the resident population of an area and the officer perceived ethnicity. In the current period however there were only five people stopped who gave their address as being within City grounds.

Another option available is to use the workday population which includes all people who gave a fixed work place in the City and those residents who are at home during the day however given that 63% (n=475) of stops occur outside of a typical working day (Monday-Friday 08:00-18:00) this is also unlikely to give an accurate representation of the available street population. Particularly during the current climate of coronavirus with many people working from home this is likely not to be relevant.

When we look at the residential addresses of people stopped this quarter 64% live in the greater London area, 8% are of no fixed abode, 21% are from other areas and 7% did not give their address.

Based on this disproportionality has been calculated using the residential population figures for the whole London region.

In terms of population data the most recent finalised census data is from 2011 so that has been used here. The most recent midyear estimates for 2018 were also checked but did not offer much difference in terms of results.

Levels of disproportionality have decreased slightly across this quarter from 1.9 to 1.6 for Black individuals and from 1.3 to 1.2 for Asian individuals, the level for other ethnicities has remained the same.

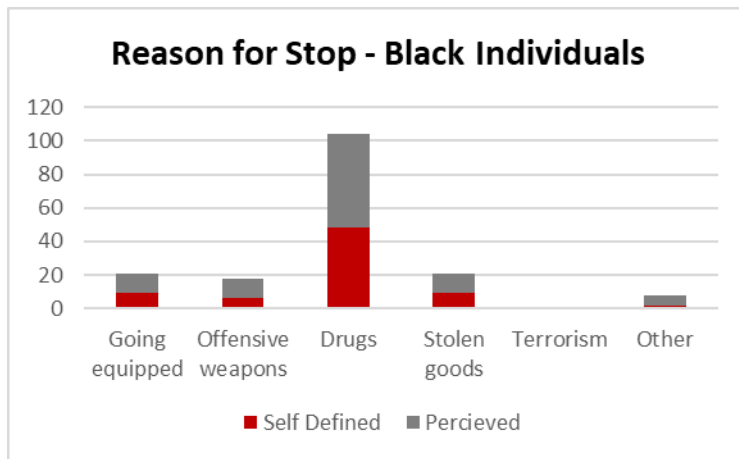


Across the same period the figures for the Metropolitan Police are 4.5 for Black individuals and 1.6 for Asian individuals.

### 3.3 Breakdown by Ethnicity – Black (Self Defined and Perceived)

There were 74 individuals stopped this quarter who self-defined their ethnicity as black, nearly all of whom were perceived to be black by officers. A further 99 people were perceived as black and either did not state their ethnicity (86) or self-defined as coming from mixed (12) or other ethnic group (1).



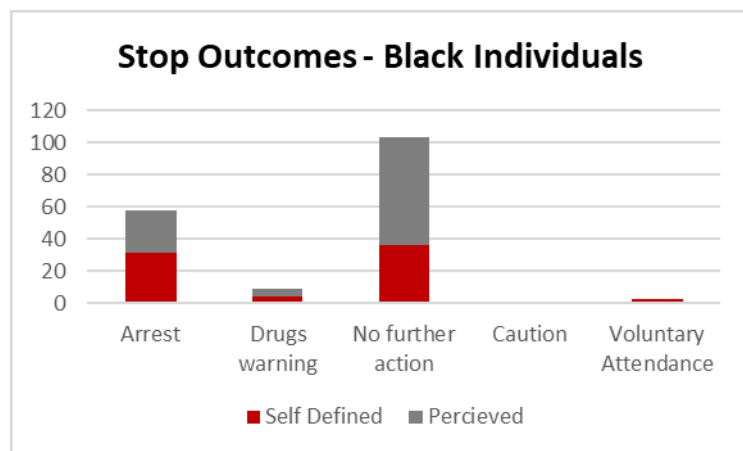


The number of black individuals stopped in relation to stolen goods, going equipped, drugs and offensive weapons all double when perceived ethnicity is included alongside self-defined. The highest volume increase is seen with drugs stops rising from 48 to 104.

Compared the whole stop cohort for the quarter black individuals (self-defined and perceived) were more

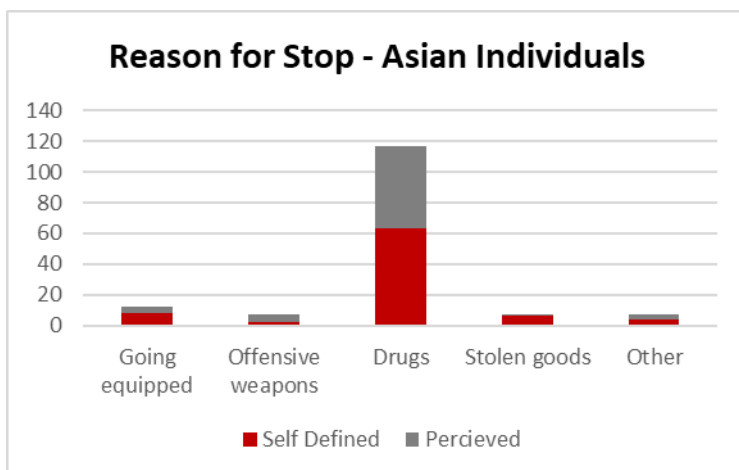
likely to be stopped for offensive weapons (10% compared to 5%) but were stopped at a similar rate to the whole group for all other reasons.

Stop outcomes for both perceived and self-defined black ethnicity show 60% of individuals were no further actioned (n=103) and 34% were arrested (n=58). This is similar to the percentages for all stops; 31% arrested and 62% no further action. There were no community resolutions issued to black individuals this quarter and just one caution and nine drugs warnings.



### 3.4 Breakdown by Ethnicity – Asian (Self Defined and Perceived)

There were 83 individuals stopped this quarter who self-defined their ethnicity as Asian, most of whom were also perceived as Asian by officers. A further 67 people were perceived as Asian but 60 did not state their ethnicity or self-defined as coming from mixed (3) or other ethnic group (4).



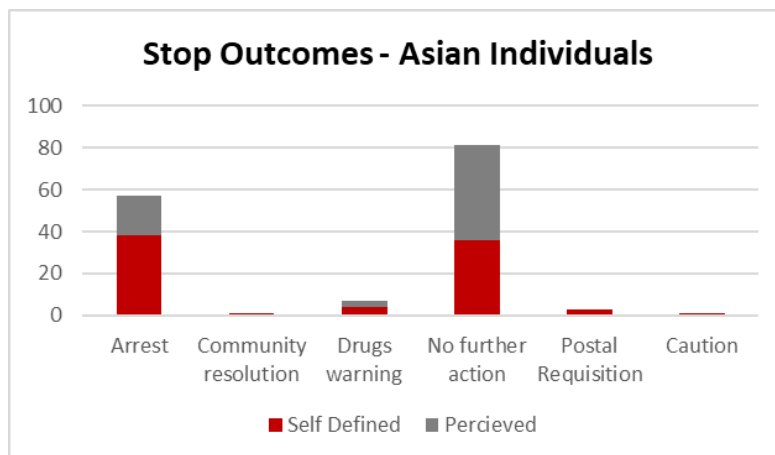
The majority of stops involving Asian individuals relate to drugs (78%, n=117) with numbers of stops in other categories being very low. The inclusion of perceived ethnicity significantly increases the number of stops for weapons and drugs.

Asian individuals are more likely to be stopped in relation to drugs (78% compared to 61%) than the overall cohort but less likely to be stopped

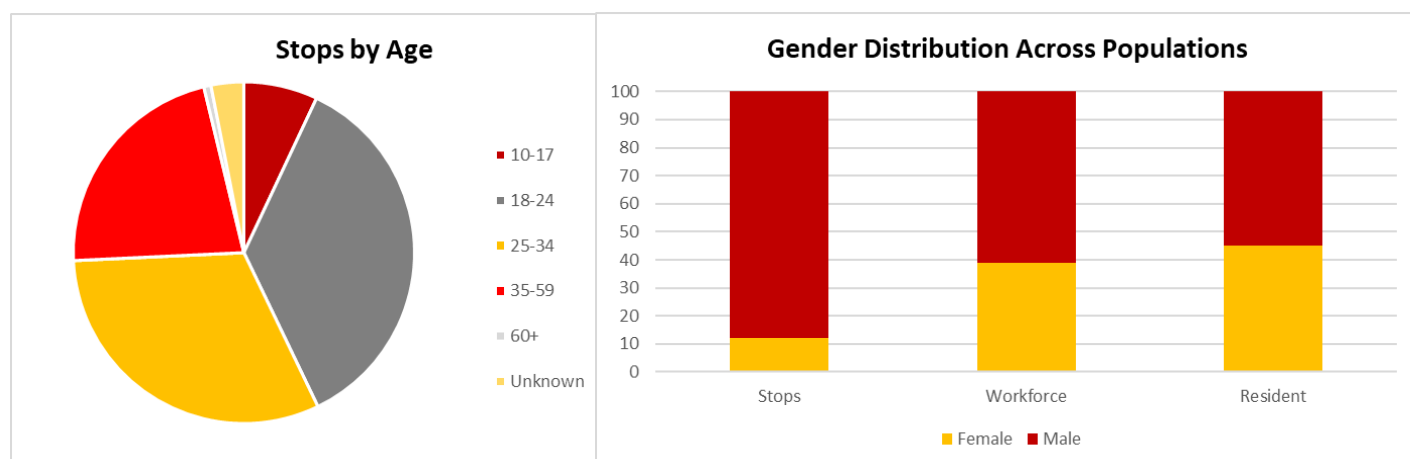
for going equipped or stolen goods (13% compared to 30%).



Just over half of all stops of Asian individuals resulted in no further action (54%, n=81) this is lower than the overall rate of 62%. The percentage arrested (38%, n=57) is higher the overall arrest rate of 31%. Almost the complete range of outcomes was applied across stops of Asian individuals with the only exception being police discretionary resolutions.



### 3.5 Age and Gender



Most people stopped are between the ages of 18 and 24 years old (36%, n=266), then 25-34 years old (31%, n=233) with few being under 18 (7%, n=52) or over 60 (n=5).

There were 52 stops of under 18s this quarter, 50 males and 2 females. The majority of under 18s stopped were between 15 and 17 (83%, n=43). The youngest person stopped was a 13 year-old white male in relation to potential drugs offences, no objects were found and he was released with no further action.

Most juvenile stops related to drugs (50%, n=26), there were two arrests made from these stops and two voluntary attendance organised after drugs were found. A further five juveniles were arrested as an outcome of theft related searches, the arrest rate for juvenile stops this quarter is 13%.

The no further action (NFA) rate for children was 83% (n=43) which is much higher than that for all stops (62%).

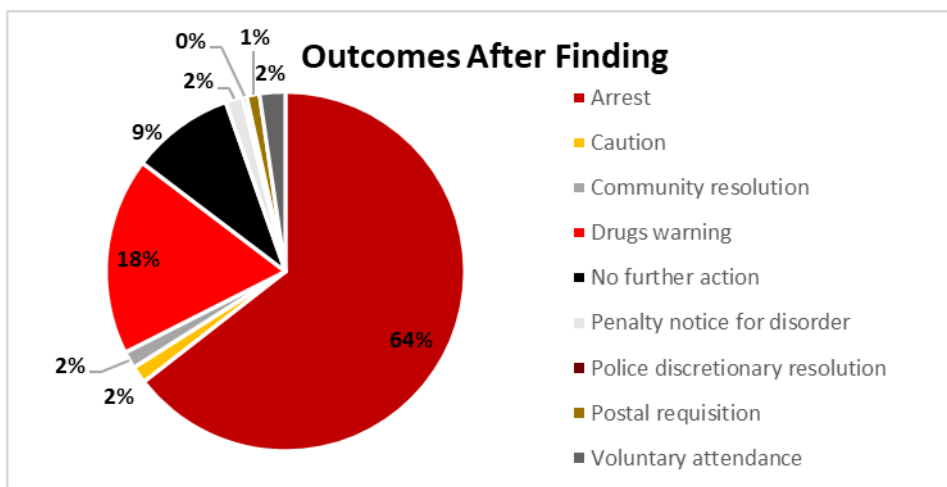
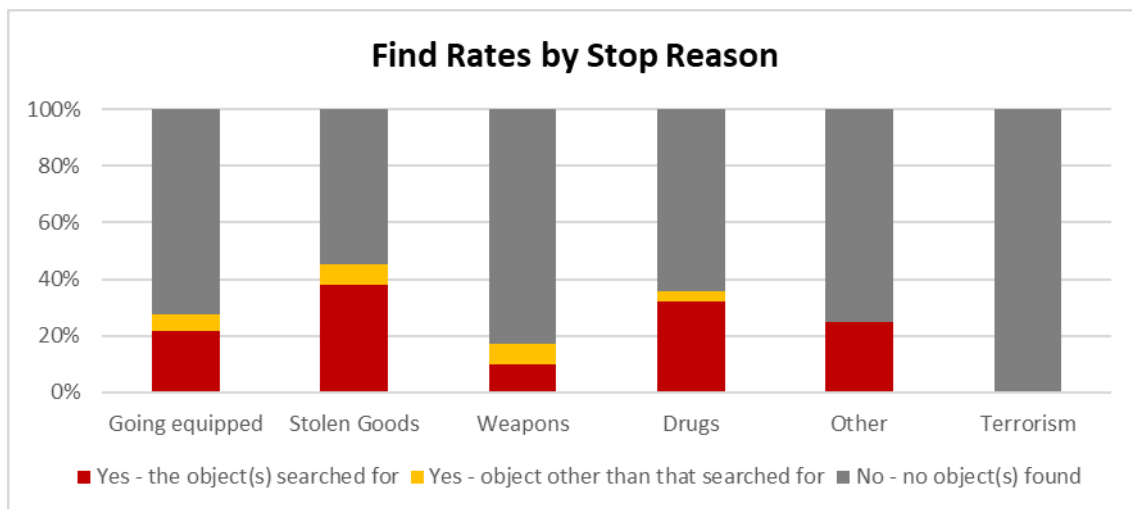
18-34 year olds were most commonly stopped in relation to drugs and those 35 and over were stopped generally for stolen goods or going equipped.

The majority of individuals stopped are male (88%, n=654) with 12% being female (n=86). This distribution is not similar to either the work force profile (61% male and 39% female) or the resident one (55% male and 45% female) with females far less likely to be stopped.

Most females (42 out of 86) were stopped in relation to going equipped or stolen goods and the most common outcome was no further action (73%, n=63), the arrest rate for females is 22% lower than for all stops (n=19). Most arrests related to stolen goods (n=6) or going equipped (n=5).

#### 4.1 Outcomes – Find Rates

There were 259 searches this quarter which resulted in an object being found, 224 where the object of the search was found and 35 where something different was discovered giving a find rate of 34%. Find rates in general were highest for stolen property searches (45%, 44 out of 97 stops) this was also the type of stop where the item searched for was most commonly found (38%, 37 out of 97 stops). Levels were also high for drugs stops where there is a find rate of 36% (166 out of 466 stops). Find rates were lowest for offensive weapons stops with only 17% resulting in an item being found (n=7).

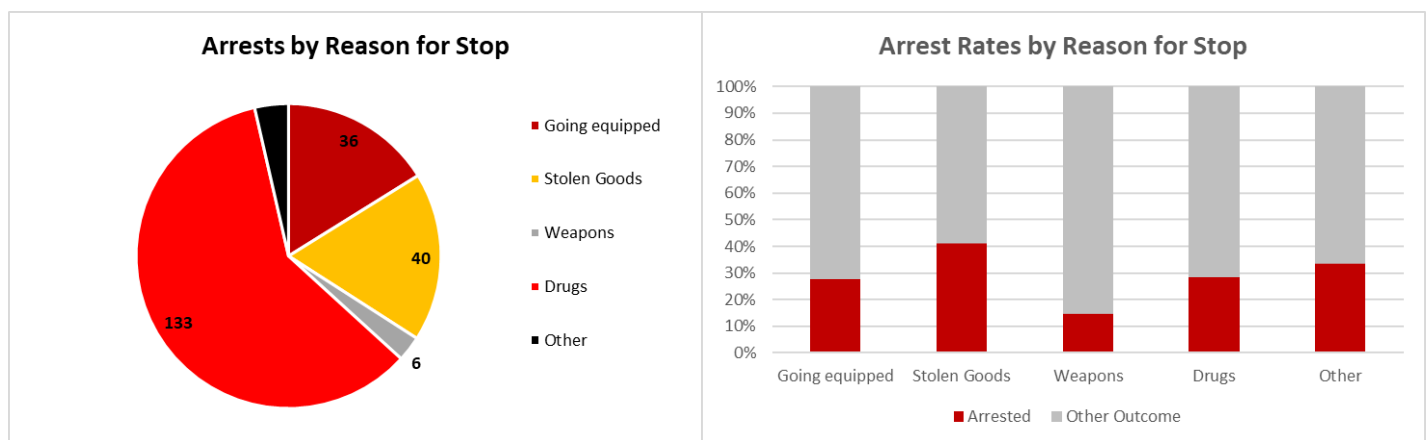


The most common outcome after finding an object was to arrest the subject of the stop (64%, n=167) then to issue a drugs warning (18%, n=46), the no further action rate after finding was 9% (n=24).

Subjects were asked to remove their outer clothing for 99 stops this quarter, mainly for drugs searches (58 stops) or going equipped searches (18 stops). There were 18 drugs searches, 2 stolen goods and one going equipped search that required full strip searches. One subject was female the remaining 20 male. Thirteen of the full strip searches resulted in objects being found (62%) and there were 13 arrests made. The youngest person strip searched was 18 and the oldest 54.

## 4.2 Outcomes – Arrests

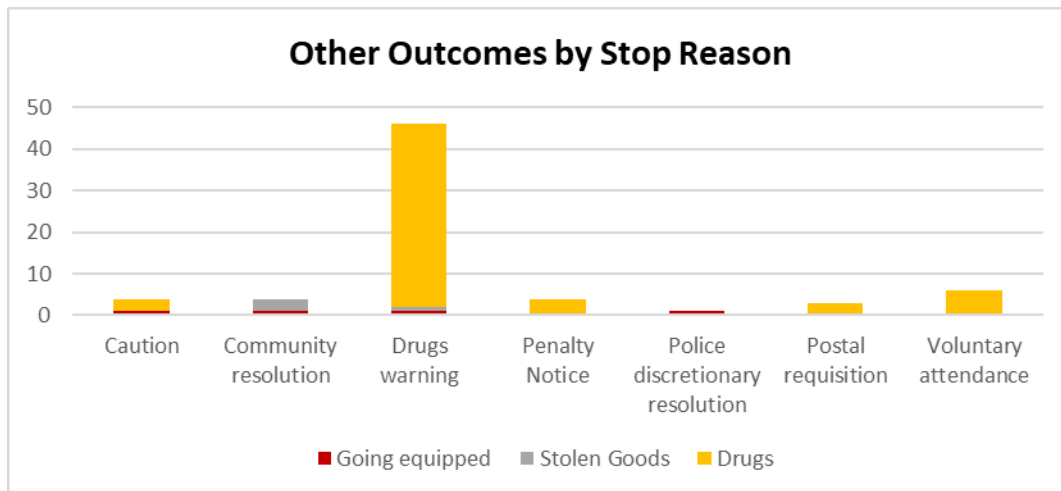
There were 223 arrests resulting from stop search this quarter, 29% of all stops. This is slightly higher than last quarter (27%) but remains around the 30% level consistently reported over the last three quarters significantly lower than previous years where the arrest rate has been 36% or 37%.



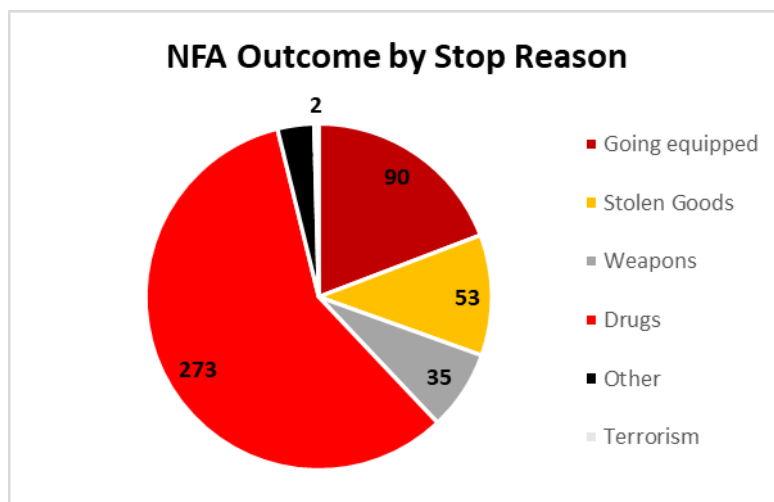
Most arrests in the current quarter resulted from drug stops (85%, n=133) or stolen goods (25%, n=40). When we look at arrest rates instead of volume the arrest rate was highest for stolen goods stops (41%) followed by drugs stops (29%).

Roughly one in three arrests (33%, n=74) were the secondary outcome of the stop and as such were not related to the object of the search, this most commonly happens in the case of drug stops (47) and the rate of secondary arrests was highest for offensive weapons as all arrests were related to other matters such as wanted on warrant or found in possession of stolen goods.

### 4.3 Outcomes – Other



The positive outcome rate this quarter is 38% (n=291) up 3 percentage points from last quarter. Outside of arrests the most common resolution was to issue a drugs warning (46) at the point of the stop. The widest range of outcomes can be seen for drugs stops where every outcome but police discretionary resolution and community resolution was used this quarter. One discretionary resolution was used in relation to going equipped.



The overall No Further Action (NFA) rate for stops this quarter is 62% (n=469), excluding terrorism stops which were only 2 in number and both NFA's the highest NFA rate is for offensive weapon stops (85%, 35 out of 41 stops) then going equipped (69%, 90 out of 130 stops). The NFA rate is lowest for stolen property stops (55%, 53 out of 97 stops).

## 4.4 Outcomes – Age, Gender and Ethnicity Summary

### 4.4.1 Perceived Ethnicity

The arrest rate is highest amongst Asian individuals (38%, 55 out of 144 stops) after this the arrest rate is highest amongst black individuals (33%, 57 out of 171 stops).

Drugs warnings were most commonly issued to white individuals as were police discretionary resolutions.

No further action rates were highest for middle eastern individuals (74%, 14 out of 19 stops) then white individuals (66%, 243 out of 367 stops).

Find rates were highest amongst Asian individuals (35%, 51 out of 93 stops).

### 4.4.2 Age

There were four males and one female aged over 60, stopped this quarter all in relation to stolen goods or going equipped, this led to two arrests and three no further action outcomes.

Arrest rates were then highest amongst 25-34 year olds at 38% (89 out of 233 stops).

No further action rates were highest for 10-17 year olds (83%, 43 out of 52 stops).

Drugs warnings were most commonly issued to those between 18-24 years old, closely followed by 25-34. The 35-59 age group received the widest range of diversionary outcomes this quarter.

Find rates were highest for 25-34 year olds (36%, 85 of 233 stops). The find rates for 10-17 year olds is 19% (10 out of 52 stops).

There were 12 stops this quarter where the age of the subject is unknown.

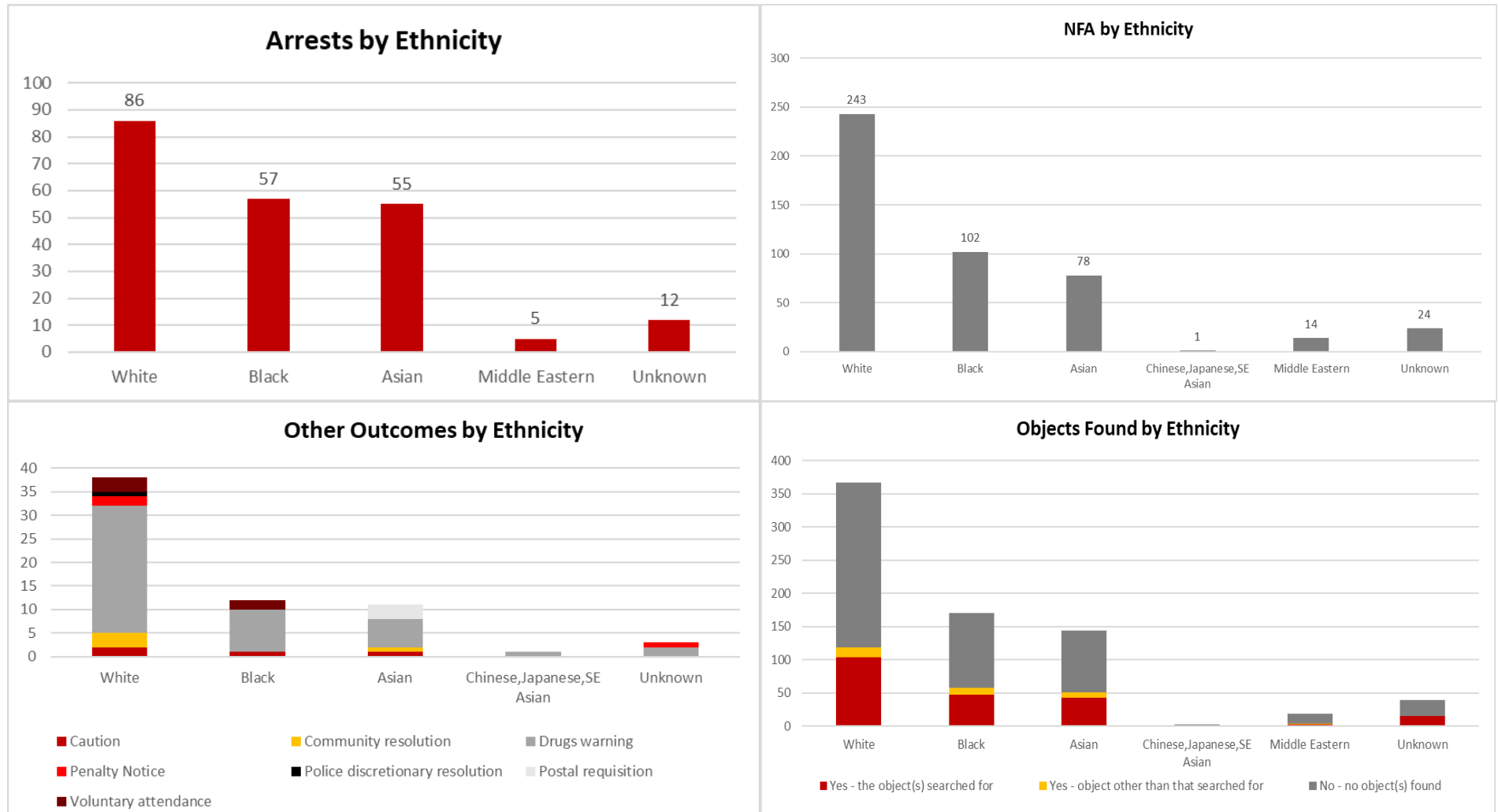
### 4.4.3 Gender

The arrest rate for females is 22% and for males 30%, the NFA rate for females is 73% and for males 61%.

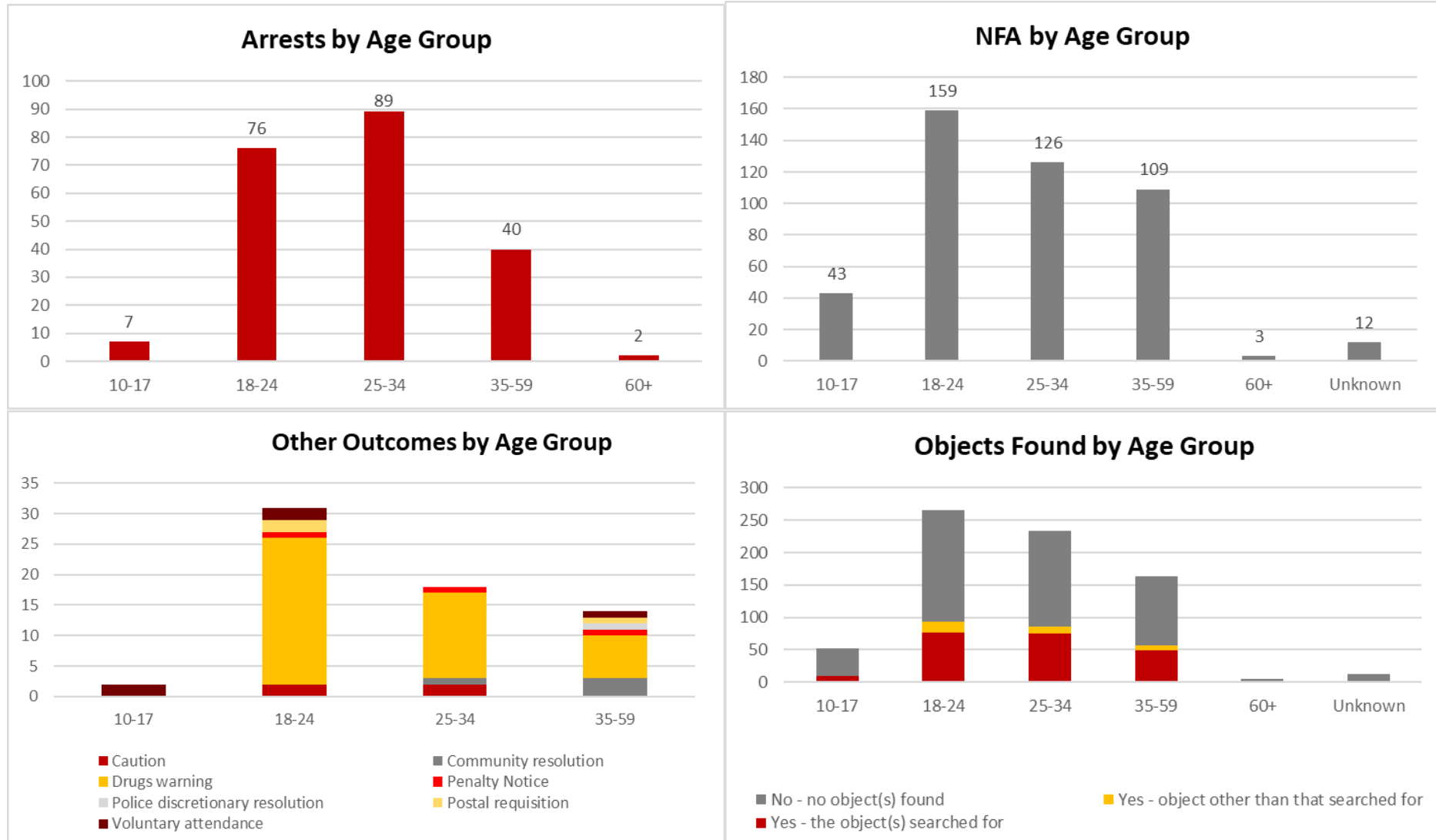
No women had a stop resulting in a caution, penalty notice, postal requisition, or voluntary attendance this quarter. Two females were issued with a community resolution, one a drugs warning and one a police discretionary resolution, these were the only alternatives to arrest and NFA this quarter.

The find rate for females (30%, n= 26) is slightly lower than that for males (34%, n=122).

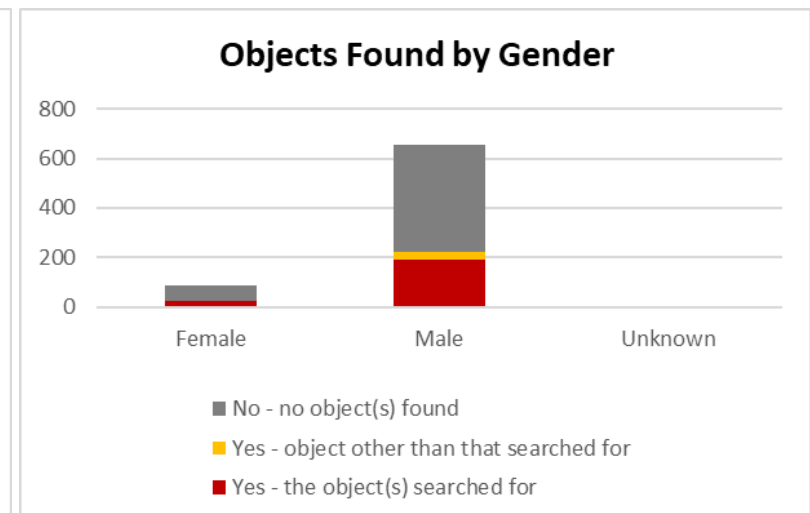
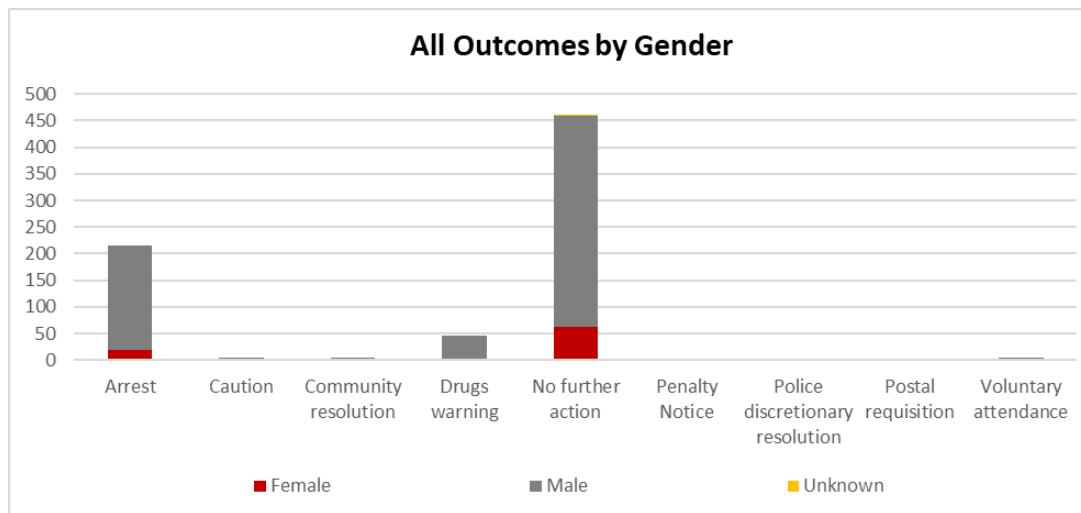
## 4.5 Outcomes – Ethnicity Breakdown



## 4.6 Outcomes – Age Breakdown



## 4.7 Outcomes – Gender Breakdown





<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date(s):</b> 26 <sup>th</sup> November 2020
<b>Subject:</b> Stop and Search data breakdown	<b>Public</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Det Supt Rogers	

### Summary

This gives a short overview of governance of Stop and Search data and also includes the Force response to observations made at the last Professional Standards and Integrity Committee about the Q1 Stop and Search data presented.

The City of London Police currently share publicly on the Force Website, the full data set as seen by the Police Authority, which shows transparency.

Internally, Stop and Search data is presented to the Force Stop and Search and Use of Force Working Group, chaired by the Superintendent Operations, Uniform Policing. This group meets quarterly. At Authority level the Force was recently directed by the Chairman of the Police Authority, to present Stop and Search data to this Professional Standards and Integrity Committee. The Force had previously reported on Stop and Search in an Annual Update to the Police Authority Board.

In addition to now presenting Stop and Search data to this Committee, it is also presented and scrutinised by the Independent Advisory Scrutiny Group (IASG) whose role is to give input and insight from a community perspective. The IASG meets every quarter to discuss the data and any other topical issues that are in the public domain.

Feedback was received at the last meeting from an Observer. Having considered this in Force, it is suggested that any further feedback from Members is collated and shared with the Force Stop and Search and Use of Force Working Group and changes can be considered before the new years' data set is agreed. The data runs from 1<sup>st</sup> April to 31<sup>st</sup> March (Financial Year). However, Members may wish to note that any more detailed breakdown than is already presented, would require an extensive manual trawl and data reconciliation. The system does not capture the data exactly in the same format as the Observer at your last Committee outlined.

To capture all data requirements at the Force Stop and Search and Use of Force Working Group meeting would allow the Performance Information team to consider if any system changes are required. This would almost certainly have a cost implication and may not give us the information needed due to the small data samples we are working with. However, this approach would ensure that in-year changes are avoided and any changes required are fully considered and introduced for the new financial year if feasible and appropriate.

Members will also be aware that the City of London Police has a very different demographic than our surrounding policing partners and as the financial hub of the UK, Members will be aware that the City also has a significant transient population, which also impacts on the demographic of individuals stopped in the City. Recent recommendations made by the IOPC for the Metropolitan Police Service, is also covered in a report on this agenda, and will also be on the agenda for the next Independent Advisory Scrutiny Group.

### **Recommendation**

It is recommended that Members note the report.

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### **Contact:**

Angie Rogers  
Superintendent  
Head of Professional Standards Department  
[Angela.Rogers@cityoflondon.police.uk](mailto:Angela.Rogers@cityoflondon.police.uk)

James Morgan  
Superintendent  
Operations UPD  
[James.Morgan@cityoflondon.police.uk](mailto:James.Morgan@cityoflondon.police.uk)

<b>Committee(s):</b> Police Authority Board  Professional Standards and Integrity Committee	<b>Date(s):</b> 6 <sup>th</sup> October 2020  26 <sup>th</sup> November 2020
<b>Subject:</b>  Use of Algorithms and AI within City of London Police	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 69-20	<b>For Information</b>
<b>Report author:</b> Gary Brailsford-Hart Director of Information (CISO & DPO)	

### Summary

The police service continues to attract the attention of the media in respect of how it uses technology to fulfil its policing purposes. Most notably the use of advanced technology such as analytical algorithms, artificial intelligence (AI) and facial recognition. Specifically, attention has been drawn to how Action Fraud makes use of technology in determining suitability for investigation.

This report provides a response to the instruction from the September Police Authority Board in relation to reporting on the use of algorithms and artificial intelligence across the City of London Police.

### Recommendation

Members are asked to:

- Note the report.

## **Main Report**

### **Background**

1. At the September Police Authority Board a member query was escalated to the Chairman regarding the use of algorithms by Action Fraud in determining which cases are progressed for investigation and its compatibility with Article 22 (automated individual decision-making, including profiling) of the General Data Protection Regulation (GDPR). An instruction was therefore given to produce a report on this specific question and was expanded to include details of any systems in use across the force making use of algorithms and/or artificial intelligence in automated decision making.
2. It is important to clarify and differentiate the use of algorithms from artificial intelligence. Algorithms take an input applies mathematics and logic to produce the output. Artificial Intelligence Algorithms take inputs and outputs simultaneously to learn the data and produce outputs. Therefore an algorithm defines the process through which a decision is made, and artificial intelligence uses training data to make such a decision.
3. The City of London Police is a Competent Authority for the purpose of Part 3 of the UK Data Protection Act (DPA) and is therefore exempt from the General Data Protection Regulations where the processing of personal Data is for the purpose of Law Enforcement. Article 22 of the GDPR does not therefore apply. However, Section 49, a similar provision, exists within Part 3 of the DPA.

### **Current Position**

4. Under article 37 of GDPR the Force is required to appoint a Data Protection Officer (DPO). This post carries a number of statutory responsibilities including the requirement to be independent and report to the highest management level. The Force has appointed an officer of sufficient seniority with direct access to the Chief Officer team and is involved in all aspects of data management and decision making across the force, including the consideration of new and emergent technology.
5. Nearly all force systems make use of algorithms, for example the crime system makes use of automated record expiration in accordance with the Management of Police Information, a set of standard instructions and conditions forming the input and the record being marked for disposal is the output. Even though these algorithms produce outputs to assist the volume and complexity of police and corporate systems they are not automated in their decision making, they merely present the output to an operator who will then make a decision or perform a task.
6. A recent review of Action Fraud business process has been conducted by the Office of the DPO in the determination of the extent to which automated decision making is taking place and whether or not further action is required.

7. The findings of this review highlighted that whilst the capability exists within the solution to automatically determine a prioritisation of fraud reports through the use of algorithms these are not currently used (due to errors within the software) to determine whether or not a case is suitable for dissemination to a partner organisation for investigation. At this time the Action Fraud process produces datasets that are then reviewed by a dedicated team of analysts for development of cases and possible dissemination. Due to the volume of reports, many will not be selected for inclusion in the dataset. Although this is a partly manual process, once the criteria have been set, reports are selected without further human intervention and this meets the definition contained in DPA section 49(1): *A controller may not take a significant decision based solely on automated processing unless that decision is required or authorised by law.*
8. The use of automated decision making has to be authorised by law, but this doesn't mean that there has to be a law which explicitly states that solely automated decision-making is authorised for a particular purpose. The Data Protection Act refers only to a decision which is 'required or authorised by law' (Chapter 2, Part 2, Section 14 (3)(b)).
9. As we have statutory and common law power to detect and investigate crime, and if we determine that automated decision-making/profiling is the most appropriate way to achieve this purpose, then we are able to justify this type of processing as authorised by law and rely on Article 22(2)(b). However we must be able to show that it's reasonable to do so in all the circumstances.
10. Policing activity is extensively regulated and it is reasonable to conclude that the processing is lawful.
11. The Office of the DPO has established safeguards within the organisation to ensure that any processing of information is fully considered and in accordance with the Data Protection Act and applied GDPR. A Data Protection Impact Assessment (DPIA) (Appendix 2) is conducted where any new processing is taking place and every DPIA is subject to review and approval by the DPO, any high risk processing is identified through this process and the DPO will raise any concerns directly with the Chief Officer team or the Information Commissioners Office if appropriate.
12. In addition to the DPIA, the Office of the DPO is introducing a Data Ethics Framework (Appendix 3) to ensure that processing is considered on ethical grounds as well as legislative compliance. The process is currently in the early stages of implementation but is considered a necessary approach to support future technical, procedural and analytical ambitions.
13. The force does not currently make use of artificial intelligence (AI) in any of its operational systems. However, it is anticipated that AI will become more mainstream in the technical systems being deployed to assist policing and we would be naïve to not ensure we are able to lawfully and ethically exploit this technology to ensure we are effective in protecting the public. By contrast we are already seeing criminals using AI to commit crime unhindered by geographic boundaries or regulation.

14. National Policing and Government are developing frameworks to support the Police in the use and exploitation of technology in contentious areas, such as data analytics and facial recognition. However, although the production of such frameworks will guide the implementation of those technologies they will still be subject to the established data protection regime across the City of London Police.

## **Conclusion**

15. The use of algorithms in the automated decision making by Action Fraud is proportionate, necessary and lawful. There are sufficient safeguards in place to ensure that information is being processed in accordance with the Data Protection Act 2018.
16. The use of algorithms across the Force is common place but are relatively simple operators and are not used for any significant decision making. Therefore it is not considered relevant for data protection act purposes.
17. Although artificial intelligence is not currently in use, the Force will be seeking opportunities to enhance our policing capabilities in accordance with the pace and demands of modern policing ensuring this is undertaken in a lawful, ethical and timely manner.

## **Appendices**

- Appendix 1 – UK Data Protection Act 2018 considerations
- Appendix 2 – CoLP Data Protection Impact Assessment Template
- Appendix 3 – CoLP Data Ethics Framework Template

### **Gary Brailsford-Hart**

Director of Information (CISO & DPO)

T: 0207 601 2352

E: [gary.brailsford@cityoflondon.pnn.police.uk](mailto:gary.brailsford@cityoflondon.pnn.police.uk)

## Appendix 1 – Data Protection Act 2018 Considerations

City of London Police is a *Competent Authority* for the purpose of Part 3 of the Data Protection Act and is therefore exempt from the General Data Protection Regulations where the processing of personal Data is for the purpose of Law Enforcement. Article 22 of the General Data Protection Regulation (GDPR) does not therefore apply to the processing of fraud reports by Action Fraud/NFIB. However, Section 49 a similar provision exists within Part 3 of the DPA:

*Right not to be subject to automated decision-making*

(1) *A controller may not take a significant decision based solely on automated processing unless that decision is required or authorised by law.*

(2) *A decision is a “significant decision” for the purpose of this section if, in relation to a data subject, it—*

(a) *produces an adverse legal effect concerning the data subject, or*

(b) *significantly affects the data subject.*

There is no further clarification in the Act or the ICO website regarding subsection (1), but the ICO provides the following advice in respect of the similar GDPR provision:

### Significant Decision

*If you are unsure whether a decision has a similarly significant effect on someone you should consider the extent to which it might affect, for example, their financial circumstances...*

It is therefore reasonable to conclude that the decision is significant and this section is engaged.

### Required or Authorised by law

*The decision has to be authorised by law, but this doesn’t mean that there has to be a law which explicitly states that solely automated decision-making is authorised for a particular purpose. The Data Protection Act 2018 (DPA 2018) refers only to a decision which is ‘required or authorised by law’ (Chapter 2, Part 2, Section 14 (3)(b))*

*If you have a statutory or common law power to do something, and automated decision-making/profiling is the most appropriate way to achieve your purpose, then you may be able to justify this type of processing as authorised by law and rely on Article 22(2)(b). However you must be able to show that it’s reasonable to do so in all the circumstances.*

Policing activity is extensively regulated and it is reasonable to conclude that the processing is lawful.

### Safeguards

Section 50 requires the following safeguards to be in place where automated processing takes place in accordance with Section 49 above:

(2) *Where a controller takes a qualifying significant decision in relation to a data subject based solely on automated processing—*

(a) *the controller must, as soon as reasonably practicable, notify the data subject in writing that a decision has been taken based solely on automated processing, and*

(b) *the data subject may, before the end of the period of 1 month beginning with receipt of the notification, request the controller to—*

(i) *reconsider the decision, or*

*(ii) take a new decision that is not based solely on automated processing.*

*(3) If a request is made to a controller under subsection (2), the controller must, before the end of the period of 1 month beginning with receipt of the request—*

*(a) consider the request, including any information provided by the data subject that is relevant to it,*

*(b) comply with the request, and*

*(c) by notice in writing inform the data subject of—*

*(i) the steps taken to comply with the request, and*

*(ii) the outcome of complying with the request.*

We comply with the requirement to reconsider any automated decision via the established complaints procedure and, if escalated, via PSD.



## Data Protection Impact Assessment (DPIA) – Stage 1

Template Version Control			
<b><u>*** IMS Use Only ***</u></b>			
Version	Purpose/Change	Author and Role	Date
1.0	Final version	Gary Brailsford-Hart – Director of Information Management Services (IMS)	DD/MM/YYYY
1.1	Revision of numbering in section 2.9. Formatting of detail/description area. Template and DPIA version controls added.	Jonathan Hands – Senior Information Officer in IMS	29/04/2020
1.2	Data flow diagram requirement added to 2.4 and structured requirements added to 2.5 and 2.11.	Jonathan Hands – Senior Information Officer in IMS	07/07/2020
1.3	Headings introduced to 2.1 for ease of understanding.	Jonathan Hands – Senior Information Officer in IMS	21/09/2020

DPIA Version Control			
Version	Purpose/Change	Author and Role	Date
			DD/MM/YYYY

This form is Stage 1 of the Data Protection Impact Assessment (DPIA) process. You are advised to refer to the guidance material available here before completing the form.

### Data Protection Impact Assessment (DPIA)

Please provide as much detail as possible, avoiding technical language and acronyms, explaining the proposal in a way that someone with no prior knowledge could easily understand.

#### Section 1 - Governance

Project Proposal Name:	
Information Asset Owner:	
Information Custodian:	
DPIA Coordinator:	
Date on which processing will commence:	DD/MM/YYYY
Date submitted to IMS:	DD/MM/YYYY

Note: IMS will give an **initial response** within 10 working days of receiving the completed form.

#### IMS Assessment

##### \*\*\*IMS Use Only\*\*\*

A. DPIA is not mandatory.	<input type="checkbox"/>	
B. DPIA is not required as long as the remedial action listed is carried out. If the remedial action is not carried out, a DPIA will be required.	<input type="checkbox"/>	
C. DPIA is mandatory.	<input type="checkbox"/>	

## Section 2 - Purpose, Scope and Context

In this section you must explain what the processing is, who it will involve, and the intended impact. You must also demonstrate why the processing is necessary and proportionate, providing evidence to support your assessment.

- The processing must be **necessary** for the specific objective of the proposal.
- It must also be **proportionate**, meaning that the advantages resulting from the processing should not be outweighed by the disadvantages to individuals.

**2.1 Please briefly explain the specific aim and purpose of the proposal in a way that someone with no prior knowledge could easily understand; avoid technical language and acronyms.**

**Aim and Purpose (policing, law enforcement, etc.);**

**Necessity;**

**Proportionality;**

**2.2 What categories of personal data will be processed?** Provide an overview of the categories of personal data that will be processed, for example: names, DOBs, addresses, health data, criminal records, or any other unique identifiers such as IP addresses, usernames, e-mail addresses.

**2.3 Will special category data be used in the proposal?** (Select all that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> Race                  | <input type="checkbox"/> Trade union membership |
| <input type="checkbox"/> Ethnic origin         | <input type="checkbox"/> Genetic Data           |
| <input type="checkbox"/> Political opinions    | <input type="checkbox"/> Biometric Data         |
| <input type="checkbox"/> Sex life              | <input type="checkbox"/> Sexual orientation     |
| <input type="checkbox"/> Religion              | <input type="checkbox"/> Health                 |
| <input type="checkbox"/> Philosophical beliefs | <input type="checkbox"/> None                   |

**2.4 How will the data be collected?** Briefly outline how you will obtain the data, examples include: directly from data subjects, from another data set already in the COLP's possession, from a partner agency.

**2.4.1 Information lifecycle/data flow diagram.** Please provide a diagram or table indicating the flow of data within this proposal, from "cradle (source) to grave (deletion)". This should reflect the information lifecycle.

<b>2.5 How will the data be used?</b> Briefly describe how the data will be used, recorded, and stored and who it will be shared with.	
<p><b>How the data will be used (intel development, prevent and/or detect crime, bring offenders to justice, etc.);</b></p> <p><b>How the data will be recorded (online report, Niche, LAN drives, etc);</b></p> <p><b>How the data will be stored;</b></p> <p><b>Who it will be shared with;</b></p>	
<b>2.6 How many individuals will the processing affect?</b> (Please specify one answer below)	
<input type="checkbox"/> Fewer than 100 data subjects <input type="checkbox"/> 100 to 1000 data subjects <input type="checkbox"/> 1000 to 5000 data subjects <input type="checkbox"/> More than 5000 data subjects	
<b>2.7 What categories of data subject are involved?</b> (Please select all applicable categories below)	
<input type="checkbox"/> Persons suspected of having committed or being about to commit a criminal offence <input type="checkbox"/> Persons convicted of a criminal offence <input type="checkbox"/> Persons who are or may be victims of a criminal offence <input type="checkbox"/> Witnesses or other persons with information about offences <input type="checkbox"/> Children or vulnerable individuals <input type="checkbox"/> COLP staff (current and former) <input type="checkbox"/> Other	
If other then please provide further details below: <a href="#">Click here to enter text.</a>	
<b>2.8 Will it involve the collection of new information about individuals?</b> Will the COLP collect data that it has not previously collected or had access to? An example of new information is medical data, facial recognition, track and trace, etc.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>2.9 Data Sharing</b> <b>Does the processing involve:</b>	<b>Select one option</b>

2.9.1	Data being shared with third parties external to the COLP or recipients that have not previously had routine access to the information?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.2	Transferring data outside the UK but within the EU?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.3	Transferring data outside the EU?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.4	Storing data using a cloud service provider?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.5	Is there an MoU, contract, or other sharing agreement in place with all parties with whom data will be shared?	<input type="checkbox"/> Yes – agreements in place <input type="checkbox"/> Yes – agreements to be signed off following DPIA(s) sign off <input type="checkbox"/> Not yet – agreements required <input type="checkbox"/> No – none required

**2.10 Why it is necessary to use personal data to achieve the aim and why can't the aim be achieved by other means?**  
 For example, can the aim be achieved by using less data or different types of data?  
 Are all categories of data necessary to achieve the aim?

**2.11 Explain how the use of personal data is proportionate to the aim of the proposal.** Weigh the advantages of achieving your purpose against disadvantages to data subjects.

**Advantages of achieving the purpose;**

**Disadvantages to data subjects;**

**Balance;**

### Section 3 – Lawful Basis

#### 3.1 Lawful Basis

To process personal data you must have a lawful basis. Please select the one appropriate lawful basis from the drop down list.

Lawful Basis for **Operational Data** (Personal data processed for law enforcement purposes):

Choose an item.

Lawful Basis for **Administrative Data** (Personal data processed for non-law enforcement purposes, e.g. for HR or Commercial purposes):

Choose an item.

### 3.2 Further Special Category Lawful Basis

If processing special category data (section 2.3) you must have identified a further lawful condition

#### **Operational Data:**

The processing is strictly necessary (please tick to confirm) ☐

#### **AND**

One of the following conditions applies (select from the list):

Choose an item.

#### **Administrative Data**

It is necessary for one of the following conditions (select from the list):

Choose an item.

#### **OR**

It is in the substantial public interest (tick to confirm) ☐

**AND** for the following purpose:

Choose an item.

## Section 4 – Review, Retention and Disposal

**4.1 Does the proposal have a review, retention and disposal process that complies with COLP Policy?** All records must have an initial retention period set by the owner of the information when first created or received; review and disposal criteria are defined within the COLP IM document suite.

- ☐ Yes  
☐ No

## Section 5 – ICO: Additional Factors

The Information Commissioner's Office have published a number of factors that present a 'high risk' when processing personal data. Saying yes to one or more of the following may indicate that the processing is high risk and a Stage 2 DPIA is likely to be required.

Does the processing involve:		Please check either Yes or No	If 'Yes' then please provide further details
5.1	<b>Systematic, extensive and large scale profiling and automated decision-making about people?</b> <i>"Any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects, or significantly affect the natural person"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<a href="#">Click here to enter text.</a>

	<p>Profiling is any form of processing where personal data is used to evaluate certain personal aspects relating to an individual, including the analysis or prediction of an individual's performance.</p> <p>Automated decision-making involves making a decision that affects someone by technological means without human involvement, for example issuing speeding fines solely based on evidence captured from speed cameras.</p>		
5.2	<p><b>Large scale use of special category data or criminal offence data?</b> <i>"Processing on a large scale of special categories of data, or personal data relating to criminal convictions and offences referred to in Article 10"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.3	<p><b>Public monitoring?</b> <i>"Systematic monitoring of a publicly accessible area on a large scale"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.4	<p><b>New technologies or techniques?</b> <i>"Processing involving the use of new technologies, or the novel application of existing technologies (including Artificial Intelligence)"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.5	<p><b>Profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?</b> <i>"Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.



5.6	<b>Biometrics/genetic data?</b> <i>"Any processing of biometric data" and/or "any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject" Biometric data can include Facial Recognition technology, fingerprints and is defined as</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.7	<b>Data matching?</b> <i>"Combining, comparing or matching personal data obtained from multiple sources"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.8	<b>Invisible processing?</b> <i>"Processing of personal data that has not been obtained direct from the data subject in circumstances where providing a Privacy Notice would prove impossible or involve disproportionate effort"</i>  For example, when gathering data, without the knowledge of the data subject, in the course of a COLP investigation.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.9	<b>Tracking?</b> <i>"Processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.10	<b>Targeting of children or other vulnerable individuals?</b> <i>"The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children"</i>  For example, the use of personal data relating to children for the purposes of marketing their online safety products.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

5.11	<b>Risk of physical harm?</b> <i>"Processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals".</i>  For example, if data relating to CSAE, HUMINT or protected persons data was compromised then it could jeopardise the safety of individuals.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.12	<b>Evaluation or scoring?</b> <i>"Aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements" For example, as part of an COLP recruitment process.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.13	<b>Data processed on a large scale.</b> <i>Considerations include:</i> <ul style="list-style-type: none"> <li><i>The number of data subjects concerned</i></li> <li><i>Volume of data and/or range of data items</i></li> <li><i>Duration, or permanence, of the data processing</i></li> <li><i>Geographical extent of data processing</i></li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.14	<b>Preventing data subjects from exercising a right?</b> <i>The rights are:</i> <ul style="list-style-type: none"> <li><i>The right to be informed</i></li> <li><i>The right to access data</i></li> <li><i>The right to rectification</i></li> <li><i>The right to erasure</i></li> <li><i>The right to restrict processing</i></li> <li><i>The right to object</i></li> <li><i>The right to portability</i></li> <li><i>Rights relating to automated processing</i></li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

**Please forward the completed form to IMS via the Data Protection mailbox account.**

## Data Protection Impact Assessment (DPIA) – Stage 2

Template Version Control			
<b><u>*** IMS Use Only ***</u></b>			
Version	Purpose/Change	Author and Role	Date
1.0	Final version	Gary Brailsford-Hart – Director of Information Management Services (IMS)	DD/MM/YYYY
1.1	Formatting of detail/description area. Additions to consultation groups. Template and DPIA version controls added.	Jonathan Hands – Senior Information Officer in IMS	29/04/2020
1.2	6.1 updated.	Jonathan Hands – Senior Information Officer in IMS	21/09/2020

DPIA Version Control			
Version	Purpose/Change	Author and Role	Date
			DD/MM/YYYY

In this stage of the DPIA process you must provide full details about the lifecycle of the data and the risks associated with the proposal. The information you provide will supplement the information provided in Stage 1.

The aim of this process is to identify and mitigate risks. If any **residual risks** to individuals are **high** then the ICO must be consulted before processing commences. This should be undertaken with the expertise of the COLP Information Management Services (IMS).

## Section 6 - Impact

**6.1 Expanding upon the purpose outlined in Section 2.1, please detail the intended effect of the processing on: the COLP; the data subjects; and society/the general public.**

Describe the benefits and disadvantages to each of the above.

**Benefits to data subjects (suspects/victims);**

**Disadvantages to data subjects (suspects/victims);**

**Benefits to society and general public;**

**Disadvantages to society and general public;**

## Section 7 - Information Lifecycle

### 7.1 Diagrams and Tables

Please insert a diagram or table that demonstrates the flow of data within this proposal. You should reflect the information lifecycle.

### 7.2 Provide a full description of the information lifecycle

Stage of Processing	Description
<b>Collection</b> Where does the data originate from, who will collect it, how will the data be obtained and how often?	
<b>Storage</b> Describe where and how the data is to be stored.	
<b>Use</b> Describe how the data will be used. Describe whether it involves new technology or novel processing.	

<b>Access</b> Describe who has access to the data throughout the life of the processing.	
<b>Recording</b> Describe the processes for recording the data.	
<b>Processors</b> Describe the use of processors. If a third party is being used then is a contract in place to regulate the relationship? Will the data be processed outside of the UK or the EU?	
<b>Sharing</b> With which external organisation(s) is the data shared, what data is shared, and why? Describe any sharing that will occur within the COLP. Outline any national and international sharing or processing.	
<b>Review and Retention</b> Describe your plan for review and retention, linking to a retention schedule where appropriate.	
<b>Disposal</b> Describe the process for disposal of data, including when and how.	
<b>7.3 Assets</b> Describe the assets that you intend to use.	
<b>Hardware</b>	
<b>Software</b>	
<b>Networks</b>	
<b>Hardcopy/paper</b>	
<b>Any other relevant assets</b>	

## Section 8 - Consultation

You should consider seeking the views of data subjects unless there's good reason not to. If it's not appropriate to consult then you must clearly document the reasons why. For example, if the processing is taking place without the knowledge of data subjects and consultation would prejudice a law enforcement purpose then you should make this clear. If the processing involves staff data then you consider consulting them or their representatives.

### 8.1 Do you intend to consult data subjects?

☐ **Yes**

If yes then outline your plan in **Section 8.2** below together with details of consultation with other stakeholders.

☐ **No**

If no then outline why this is the case in the text box. Once completed, outline whether you will consult any other stakeholders in **Section 8.2** below.

Click here to enter text.

### 8.2 Consultation Action Log

Explain what steps you will take, or have taken, to consult stakeholders. Stakeholders may include:

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Data subjects</li> <li>• The general public</li> <li>• Union representatives</li> <li>• Information Security</li> <li>• IMS</li> <li>• Other police forces</li> <li>• Biometrics Commissioner</li> <li>• College of Policing</li> <li>• Human rights groups</li> </ul> | <ul style="list-style-type: none"> <li>• COLP Legal</li> <li>• Operational Security Advisor (OpSy)</li> <li>• Partner agencies</li> <li>• Data processors</li> <li>• Information Commissioner's Office (ICO)</li> <li>• Home Office</li> <li>• Surveillance Camera Commissioner</li> <li>• National Police Chief's Council</li> </ul> |
|---|---|

Who	When	How	Outcome

**Section 9 - Full Risk Assessment**

**Identify and Assess Risks**

In this section you must detail **all** data protection risks, as well as any associated with privacy and the rights and freedoms of individuals. **The assessment criteria outlined in italics in section 9.1 applies to all categories** in Section 9 and 10 i.e. for 'likelihood' you must always assess whether it is 'rare, unlikely, possible, likely or almost certain'.

Consider the impact on individuals and any harm or damage that might be caused, whether physical, emotional or material. Different levels of interference may occur at different stages of the information lifecycle. The European Court of Human Rights has held that a public authority merely storing data is a limitation on the human rights of data subjects.

Where risks are identified you must take steps to integrate solutions into the project and this must be recorded. If any **residual risks are 'high'** then the ICO must be consulted prior to processing commencing. Examples of risk factors are provided at the top of each section – these examples are a starting point and you must ensure that all factors relevant to your proposal are considered. If you run out of space then insert new lines into the table. When completing each section, if you are unable to identify a risk relevant to your proposal then please state "**No risks identified**".

Examples of **risks to individuals** include:

- Discrimination
- Identity theft
- Financial loss
- Reputational damage or embarrassment
- Physical harm
- Wrongful arrest or prosecution
- Loss of confidentiality
- Inability to exercise rights

Examples of **corporate risks** include:

- Failure to protect the public
- Loss of public confidence
- Civil litigation
- Reputational damage
- Regulatory action
- Breaching other legal obligations

You should identify **solutions** such as:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Deciding not to collect certain types of data</li> <li>• Reducing the scope of processing</li> <li>• Reducing retention periods</li> <li>• Taking additional technical security measures</li> <li>• Following approved codes of conduct</li> </ul> | <ul style="list-style-type: none"> <li>• Restricting access to data</li> <li>• Training staff to understand the risks</li> <li>• Anonymising or pseudonymising the data</li> <li>• Using different technology</li> <li>• Using an alternative third party processor</li> </ul> |
|---|--|

## 9.1 Data Protection Principles

### 1. Fair and Lawful

- Do you need to create or amend a privacy notice?
- If processing on the basis of consent, how will this be collected and recorded?

### 2. Purpose Limitation

- Does the processing actually achieve your purpose?
- Will the data be used for another purpose?
- How will you prevent function creep?

### 3. Data Minimisation

- Will you only process the data needed for your purpose?
- How will you ensure and maintain data quality?

### 4. Accuracy

- How will you ensure data can be corrected or amended?
- Will you ensure data is accurate and up to date?

### 5. Retention

- Do you have a review, retention and disposal policy?
- Can data be deleted/erased from all COLP systems if required?
- Is the retention period necessary and proportionate?

### 6. Security

- What technical and organisational measures are in place to protect data?
- How will you protect against unauthorised access, alteration or removal of data?
- What training and guidance will be given to staff?
- How would you identify and manage a breach?
- How will systems be tested?

### 7. Data Subject Rights

- If an individual wishes to exercise their rights, including requesting access to data, or asking for data to be corrected, amended, restricted or deleted then you must have procedures in place to recognise such a request and refer it to IMS.



9.1 Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk
	1 - Rare 2 - Unlikely 3 - Possible 4 - Likely 5 – Almost Certain	1 - Insignificant 2 - Minor 3 - Moderate 4 - Major 5 - Critical	High Medium Low	Describe the mitigation and whether it will be implemented	Is the risk: - Eliminated - Reduced - Accepted	High Medium Low

## 9.2 Data Sharing - including the involvement of other Controllers and Processors

- What contracts, MOUs etc are in place or may be required? - What measures have you taken place to ensure third parties comply with Data Protection laws?				- What risks are involved with sharing data? - Is sharing necessary and proportionate? - Is the sharing of data being minimised?		
Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

## 9.3 International Transfers

- Will data be shared with a third party based outside the EU? - If you will be making transfers, how will you ensure that appropriate safeguards are put in place?						
Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

## 9.4 Additional Risk Factors

Describe any further risks, ensuring that any risks not already identified are included.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

### Section 10 – Operational Data Risks - Additional Risks Relevant to Operational Data Only

This section is only applicable to proposals involving operational data. **If you are solely processing administrative data then move to Section 11.**

#### 10.1 Data Logging

Where data is processed electronically then logs must be kept for certain actions. This is to enable effective audit of processing systems, data sharing, and to verify ongoing lawfulness of processing.

If the data is processed electronically then will a log be retained of the following actions:

- **Collection**
- **Alteration**
- **Consultation**
- **Disclosure**
- **Combination**
- **Erasure**

- ☐ Yes  
☐ No\*  
☐ Not applicable

\* If you answered "no" then you must record this as a risk below.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

## 10.2 Data Categorisation

When processing data for law enforcement purposes, you must **provide where relevant and as far as possible** a clear distinction between categories of data subject.

Will there be a clear distinction between different categories of personal data suspects, for example subjects who are:

- Suspected of having committed, or are about to commit, a criminal offence
- Convicted of a criminal offence,
- Victims of a criminal offence,
- Witnesses to a criminal offence.

- ☐ Yes  
☐ No\*  
☐ Not applicable

If you answered "no" then you must record this as a risk below.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/Solution	Result	Residual Risk

## Section 11 – Outcome and Review

### 11.1 Outcome

Item	Name	Date	Notes
Residual risks approved by:			
IMS/DPO advice provided by:			
Summary of IMS/DPO advice, including whether the ICO must be consulted:			

### 11.2 Review

A DPIA is a process that should be reviewed throughout the lifecycle of the processing – it does not end at go live. Please outline the review process that you will undertake to ensure that the risk mitigations have been successful and that no new risk factors have emerged.

Outline:	<ul style="list-style-type: none"> <li>The frequency of review</li> <li>The date of the next review</li> </ul>
<ul style="list-style-type: none"> <li>Who will be responsible for reviewing the processing?</li> </ul>	

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Data Ethics Framework

Workbook

v1-0

**What is data ethics?** Data ethics is an emerging branch of applied ethics which describes the value judgements and approaches we make when generating, analysing and disseminating data. This includes a sound knowledge of data protection law and other relevant legislation, and the appropriate use of new technologies. It requires a holistic approach incorporating good practice in computing techniques, ethics and information assurance.

**How to use the Data Ethics Framework:** The Data Ethics Framework guides the design of appropriate data use in policing and the wider public sector. This guidance is aimed at anyone working directly or indirectly with data within the City of London Police, including data practitioners (statisticians, analysts and data scientists), policymakers, operational staff and those helping produce data-informed insight. The Data Ethics Framework builds on the core values of the Police Code of Ethics - honesty, integrity, confidentiality, equality and diversity - to encourage ethical data use to build better services and inform policy.

Teams should work through the framework together before starting the design or discovery phase of a new project, policy or service. Use the workbook to consider legal and ethical questions to inform the best approach for your use of data.

Each part of the framework is designed to be regularly revisited throughout your project, especially when any changes are made to your data collection, storage, analysis or sharing processes.

For advice support and guidance, please contact Information Management Service - [IMSupport@](mailto:IMSupport@)



## Data sources

Name/describe your project's key data sources, whether you're collecting data yourself or accessing via third parties.

Is any personal data involved, or data that is otherwise sensitive?

## Limitations in data sources

Are there limitations that could influence your project's outcomes?

Consider:

- > bias in data collection, inclusion/exclusion, analysis, algorithms
- > gaps or omissions in data
- > provenance and data quality
- > other issues affecting decisions, such as team composition

## Sharing data with others

Are you going to be sharing data with other organisations? If so, who?

Are you planning to publish any of the data? Under what conditions?

## Ethical and legislative context

What existing ethical codes apply to your sector or project? What legislation, policies, or other regulation shape how you use data? What requirements do they introduce?

Consider: the rule of law; human rights; data protection; IP and database rights; anti-discrimination laws; and data sharing, policies, regulation and ethics codes/frameworks specific to sectors (eg health, employment, taxation).

## Rights around data sources

Where did you get the data from? Is it produced by an organisation or collected directly from individuals?

Was the data collected for this project or for another purpose? Do you have permission to use this data, or another basis on which you're allowed to use it? What ongoing rights will the data source have?

## Your reason for using data

What is your primary purpose for collecting and using data in this project?

What are your main use cases? What is your business model?

Are you making things better for society? How and for whom?

Are you replacing another product or service as a result of this project?

## Communicating your purpose

Do people understand your purpose – especially people who the data is about or who are impacted by its use?

How have you been communicating your purpose? Has this communication been clear?

How are you ensuring more vulnerable individuals or groups understand?

## Positive effects on people

Which individuals, groups, demographics or organisations will be positively affected by this project? How?

How are you measuring and communicating positive impact? How could you increase it?

## Negative effects on people

Who could be negatively affected by this project?

Could the way that data is collected, used or shared cause harm or expose individuals to risk of being re-identified? Could it be used to target, profile or prejudice people, or unfairly restrict access (eg exclusive arrangements)?

How are limitations and risks communicated to people? Consider: people who the data is about, people impacted by its use and organisations using the data.

## Minimising negative impact

What steps can you take to minimise harm?

How could you reduce any limitations in your data sources? How are you keeping personal and other sensitive information secure?

How are you measuring, reporting and acting on potential negative impacts of your project?

What benefits will these actions bring to your project?

## Engaging with people

How can people engage with you about the project?

How can people correct information, appeal or request changes to the product/service? To what extent?

Are appeal mechanisms reasonable and well understood?

## Openness and transparency

How open can you be about this project? Could you publish your methodology, metadata, datasets, code or impact measurements?

Can you ask peers for feedback on the project? How will you communicate it internally?

Will you publish your actions and answers to this canvas openly?

## Ongoing implementation

Are you routinely building in thoughts, ideas and considerations of people affected in your project? How?

What information or training might be needed to help people understand data issues?

Are systems, processes and resources available for responding to data issues that arise in the long-term?

## Reviews and iterations

How will ongoing data ethics issues be measured, monitored, discussed and actioned?

How often will your responses to this canvas be reviewed or updated? When?

## Your actions

What actions will you take before moving forward with this project? Which should take priority?

Who will be responsible for these actions, and who must be involved?

Will you openly publish your actions and answers to this canvas?

Data Ethics Framework						
	0	1	2	3	4	5
<a href="#">1. Start with clear user need and public benefit</a>	User need is not well defined					User need is clearly defined
Description of the user need with supporting evidence						
<a href="#">2. Be aware of relevant legislation and codes of practice</a>	Needs clarification or expert input					Relevant laws are well understood
List the pieces of legislation, codes of practice and guidance that apply to your project.						
<a href="#">3. Use data that is proportionate to the user need</a>	Reuse not proportionate					Reuse of data is clearly proportionate to achieve user need
Describe how the data being used is proportional to the user need						
<a href="#">4. Understand the limitations of the data</a>	Unreliable, unsuitable data					Data is representative and accurate
Identify the potential limitations of the data source(s) and how they are being mitigated						
<a href="#">5. Use robust practices and work within your skillset</a>	Needs further expert input					Methodologies clearly designed and understood
Explain the relevant expertise and approaches that are being employed to maximise the efficacy of the project						
<a href="#">6. Make your work transparent and be accountable</a>	No scrutiny or peer review available					Oversight built in through life cycle of project
Describe how you have considered making your work transparent and accountable						
<a href="#">7. Embed data use responsibly</a>	No ongoing plan determined					Evaluation plan developed and resource in place to deliver it
Describe the steps taken to ensure any new model, policy or service is managed responsibly						

## Principle 1: Start with a clear user need and public benefit

### To consider:

Describe the user need:	
Does everyone in the team understand the user need?	
How does this benefit the public?	
What would be the harm in not using data science - what needs might not be met?	
Do you have supporting evidence for the approach being likely to meet a user need or provide public benefit?	

## Principle 2: Be aware of relevant legislation and codes of practice

### To consider:

List the pieces of legislation, codes of practice and guidance that apply to your project:	
Do all team members understand how relevant laws apply to the project?	
If necessary, have you consulted with relevant experts?	
Have you spoken to your information assurance team?	
If using personal data, do you understand obligations under data protection legislation?	

## Principle 3: Use data that is proportionate to the user need

### To consider:

If using personal data, have you answered the questions for determining proportionality? You must include evidence to support any decision.	
If using personal data, what measures are in place to control access? How widely are you searching personal data?	
How can you meet the project aim using the minimum personal data possible?	
Is there a way to achieve the same aim with less identifiable data?	
Can you use synthetic data?	
Has the data being used been provided for your analysis?	
By using data that the public have freely volunteered, would your project jeopardise people providing this again in the future?	
Could you clearly explain why you need to use that data to members of the public?	
Is there a fair balance between the rights of individuals and the interests of the community?	

Principle 4: Understand the limitations of the data

To consider:

Identify the potential limitations of the data source(s) and how they are being mitigated:	
What data source(s) is being used?	
Are all metadata and field names clearly understood?	
What processes do you have in place to ensure and maintain data integrity?	
Is there a plan in place to identify errors and biases?	
What are the caveats?	

## Principle 5: Use robust practices and work within your skillset

### To consider:

Explain the relevant expertise and approaches that are being employed to maximise the efficacy of the project	
Describe the disciplines involved and why.	
Are there expertise that the project requires that you don't currently have?	
Have you designed the approach with a policy team or subject matter expert(s)?	
Has all subject matter context, from policy experts or otherwise, been taken into account when determining the appropriate loss function for the model?	
If necessary, how can you (or with external scrutiny) check that the algorithm is achieving the right output decision when new data is added?	
How has reproducibility been ensured? Could another analyst repeat your procedure based on your documentation?	
How confident are you that the algorithm is robust, and that any assumptions are met?	
What is the quality of the model outputs, and how does this stack up against the project objectives?	
If using data about people, is it possible that a data science technique is basing analysis on proxies for protected variables which could lead to a discriminatory policy decision?	

## Principle 6: Make your work transparent and be accountable

### To consider:

Describe how you have considered making your work transparent and accountable	
Have you spoken to your organisation to find out if you can speak about your project openly?	
Have you considered how both internal and external engagement could benefit your project?	
How interpretable are the outputs of your work?	
How are you explaining how approaches were designed in plain English to other practitioners, policy makers and if appropriate, the public?	
Can you openly publish your methodology, metadata about your model, and/or the model itself e.g. on Github?	
Can you get peers to review your Pull Requests?	



# Principle 7: Embed data use responsibly

**To consider:**

Describe the steps taken to ensure any insight is managed responsibly:	
How many people will be affected by the new model, insight or service?	
Who are the users of the insight, model, or new service?	
Do users have the appropriate support and training to maintain the new technology?	
Have future events been planned for?	
Is your implementation plan correlated with the impact of a particular model?	
How often will you report on these plans to senior reporting officers?	

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<b>Committee(s):</b> Police Professional Standards and Integrity Committee	<b>Date(s):</b> 26 <sup>th</sup> November 2020
<b>Subject:</b> Equality and Inclusion Strategy update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 83-20	<b>For Information</b>
<b>Report author:</b> Stuart Phoenix, Head of Strategic Development	

## Summary

At the informal meeting of the Police Authority Board (PAB) on the 2<sup>nd</sup> April 2020, the Force presented the quarterly Equality and Inclusion Update which had been a standing quarterly item for a number of years as previously agreed. The report was noted and the Commissioner updated that the Force was reviewing its governance of this area of business and was introducing an Equality & Inclusion Operational Delivery Group that would be a tactical level group, attended by all equality and support network representatives and leads who will take ownership for delivery of specific areas of work. Members discussed the format of the update going forward and agreed that it would be more appropriate to have an update focussed on deliverables and outcomes rather than a general narrative update.

The Force had engaged an independent company in April /May 2020 to conduct an assessment of equality and inclusion functions with a view to broadening out the existing BAME action plan to include other protected characteristics, workforce culture and delivery of the National Police Chiefs Council (NPCC) Equality Toolkit. This was used as an opportunity to undertake a holistic review of this area of business and produce a refreshed Equality and Inclusion Strategy and action plan. The Strategy was presented to the Force Strategic Management Board in September at which time the Force received direction from the Police Authority Team that, going forward, this report would be an item at the PSI Committee, rather than the main Police Authority Board.

The Force agreed with the Deputy Chief Executive that future reports to the PSI would focus on this Strategy and delivery of the action plan as this would be more performance and outcome focused.

This report presents the Strategy (attached) and provides an update on the draft Action Plan, which is being circulated to Members separately for information at this stage. The next update and updates thereafter will follow up on progress against the final Action Plan.

Also attached is the Q2 recruitment data on BAME and Gender as this was previously requested. This is already reported to the Performance and Resource Management Committee.

## Recommendation

It is recommended that Members note the report.

## **Main Report**

### **Background**

1. At the informal meeting of the Police Authority Board (PAB) on the 2<sup>nd</sup> April 2020, the Force presented the quarterly Equality and Inclusion Update which had been a standing quarterly item for a number of years as previously agreed. The report was noted and the Commissioner updated that the Force was reviewing its governance of this area of business and was introducing an Equality & Inclusion Operational Delivery Group that would be a tactical level group, attended by all equality and support network representatives and leads who will take ownership for delivery of specific areas of work. Members discussed the format of the update going forward and agreed that it would be more appropriate to have an update focused on deliverables and outcomes rather than a general narrative update.
2. Although the Force had a BAME action plan which had been previously presented to the Performance and Resource Management Committee, it had been recognised that a broader action plan was required to ensure all Protected Characteristics were part of continuous improvement in this area. In April/May 2020 the Force engaged an independent company to conduct a baseline assessment of equality and inclusion functions. This was complemented by a staff survey on E&I and a series of focus groups. This informed the production of a new, over-arching strategy that not only supports delivery of the original BAME action plan, but also provides a framework that the Force can work with to comply fully with the NPCC Equality Toolkit and support the work around workforce culture that is progressing as part of Transform.
3. Running concurrently with the focus groups referenced above, the Chief Officer Team held two events to which all BAME staff and officers were invited, focussing on the issues raised by the Black Lives Matter movement. This resulted in the constitution of a Gold Group to move quickly on the issues raised. That group has now met for the last time, with the ongoing business subsumed within the work of the Strategic Equality and Inclusion Board and the supporting Operational Delivery Group.
4. The next quarterly update was due to the September PAB but the new Equality and Inclusion Strategy had yet to be presented to the Force's Strategic Management Board. The Force received direction from the Police Authority Team that going forward, this report would be an item at the PSI Committee rather than the main Board. The Force agreed with the Deputy Chief Executive that future reports to the PSI would focus on the refreshed Strategy and delivery of the supporting action plan as this would be more performance and outcome focused. It was agreed the first report would be to the November PSI.

## Current Position

5. The Strategy and Action Plan provide the framework for the Force to improve its delivery of equality of inclusion functions. The Equality and Inclusion Operational Delivery Board Chaired by a Detective Chief Supt. is overseeing delivery of the Strategy and associated actions. This Board has met 4 times since being formed and progress has been made in a number of areas, including:
  - i. Running a Positive Action Leadership Scheme (PALS) as a pilot, this is focussing initially on BAME officers and staff and is aimed at personal and professional development of the individuals involved.
  - ii. Providing more channels for exit interviews to understand better people's reasons for exiting the organisation.
  - iii. Introducing independent observers/monitors on promotion boards.
  - iv. Development of a bespoke Communications Strategy to support awareness of the work that is going on and the channels that are available to people to make their voices heard.
  - v. Launch of a Diversity Allies initiative, where individuals are being trained to support people around them and act as diversity champions in the workplace.
  - vi. Additional support for Support Networks, including training to be rolled out in December/January.
  - vii. Development of a pan-London Equality Forum to exchange best practice.
  - viii. Encouraging staff to update personal details on protected characteristics on Force systems to understand better people's needs (particularly with regards to sometimes non-apparent characteristics relating to disability, sexuality and faith).
6. The Strategy has direct links with the Police Code of Ethics, and goes further to provide outcomes for the stated Force values of Professionalism, Integrity and Fairness. It directly supports the Code's principles relating to leadership, accountability and treating all people with respect.
7. The draft Action Plan has been shared separately with Members and is a work in progress. The working draft that Members will have seen is based principally on the NPCC Equality toolkit. Additional action plans (e.g. the separate BAME action plan and work streams raised by the strategy) are still to be incorporated, together with more detailed timelines and assessments of achievement. When that work is complete, anticipated to be December 2020, progress against the consolidated plan will form the basis of future reports to your Committee.

## **Corporate & Strategic Implications**

8. The new Strategy supports delivery of all of the City of London Police Corporate Plan ambitions as it impacts the whole workforce; it supports the City of London Corporation Corporate Plan- 'People are safe and feel safe' as an inclusive and valued workforce, ensures the delivery of an effective policing service.

## **Conclusion**

9. The Force is committed to delivering on this refreshed Strategy and recognises that although significant progress was already being made there was scope to broaden work in this area. Further reports will be submitted on a quarterly basis.

## **Appendices**

- Appendix 1 – CoLP Equality and Inclusion Strategy
- Appendix 2- BAME and Gender Workforce information Q2

### **Stuart Phoenix**

Head of Strategic Planning

T: 0207 601 2213

E: [stuart.phoenix@cityoflondon.pnn.police.uk](mailto:stuart.phoenix@cityoflondon.pnn.police.uk)



# EQUALITY & INCLUSION STRATEGY

Policing in the Square Mile  
2020 – 2025

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## Forward by the Force Equality and Diversity Champion

### Assistant Commissioner



### Alistair Sutherland

As the Force Equality and Diversity Champion I fully support this strategy as it represents our formal commitment to ensure we promote equality, diversity and human rights in everything we do, enhancing the value of the services we provide to the public and making sure the Force fully represents the society we serve.

It is very important that as a Force we drive continued focus on equality and inclusion in all of the services we provide. Whether that is the way we police our communities, the way we treat victims of crime or the culture of our workforce. By embracing and understanding the richness of our diverse community we can build and maintain trust and confidence, and enhance our own performance.

We will act on the evidence collected as part of the monitoring of this strategy to ensure that we continually learn and improve. My aim is to deliver excellence to the public and be seen as an employer that values the views, skills and expertise of everyone.

I fully support the delivery of this strategy and will work with senior managers and staff to ensure the principles of this document are cascaded across the Force and become the cornerstone of our vision.

## Force Vision

Our vision is to make the City of London the safest city area in the world, regarded as a centre of excellence for protective security. This is a key ambition of our Corporate Plan. We protect the people, businesses and infrastructure of the City of London, one of the most important, dynamic and challenging environments in the UK, whilst leading the national response to fraud. Delivering our national lead force responsibilities is a key element of our Corporate Plan.

Our Policing Plan and Corporate Plan aligns directly with the City of London Corporation's Corporate Plan's aim to support a thriving economy. We do this by leading on the physical security of the Square Mile, maintaining well established relationships with commercial and law enforcement partners locally, regionally, nationally and internationally. We also support the City Corporation's aim for a flourishing society by leading excellence in policing locally through to globally, delivering safer communities, preventing and combatting crime.

Our primary aim is to protect the people and infrastructure of the City of London, ensuring the Square Mile remains a safe and vibrant place to live, work and visit. The priorities outlined in this plan address these threats as well as the concerns raised by you, which includes antisocial behaviour and supporting victims of crime.

## Force Equality, Diversity, and Inclusion Vision

Our Force vision is to ensure that all communities, individuals, charities and businesses receive an excellent and consistent experience. Our Force engages with local, national and international communities across the globe, who all have diverse needs. **We know that we cannot achieve this vision without a high performing workforce that embraces diversity and inclusion at its core.** We have created this equality, diversity and inclusion strategy to set out how we will achieve this vision over the next 5 years.

## Context

During 2020 the City of London Police engaged an external consultancy to conduct a review of the Force's work thus far, complete a benchmarking exercise and lead listening exercises with staff. Out of this review this strategy and the accompanying action plan were written. This strategy has been shaped by:

- Best practice feedback from the Inclusive Employers Standard benchmarking audit
- Anonymous focus groups, 1:1 interviews, and an all-staff survey
- NPCC EDI strategies and toolkits
- Public Sector Equality duty reports including gender pay gap and staff demographic data
- Existing City of London Police work in this area including the BAME<sup>1</sup> action plan
- City of London Police Leadership principles
- National Police Code of Ethics
- Current best practice in inclusion and diversity

This strategy is intended as an overarching vision for inclusion and diversity in the Force, under which sits the action plan pulling together ongoing work, reporting requirements and development areas into one cohesive plan.

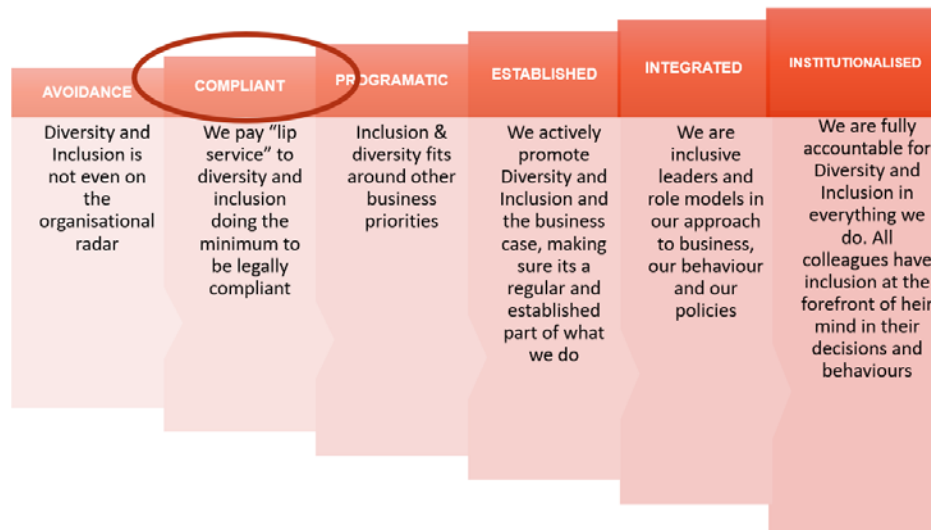
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<sup>1</sup> Please note that the term "BAME" is used here and elsewhere in the document as a form of shorthand and is in no way intended to be exclusive of individuals or groups whose needs and experiences as different ethnicities merit their inclusion. We are aware that the term is sometimes used in a way that excludes some minorities (such as Jewish, white Muslim, and ethnically Eastern European), and who have specific experiences and needs.

## 2020: Where we are now

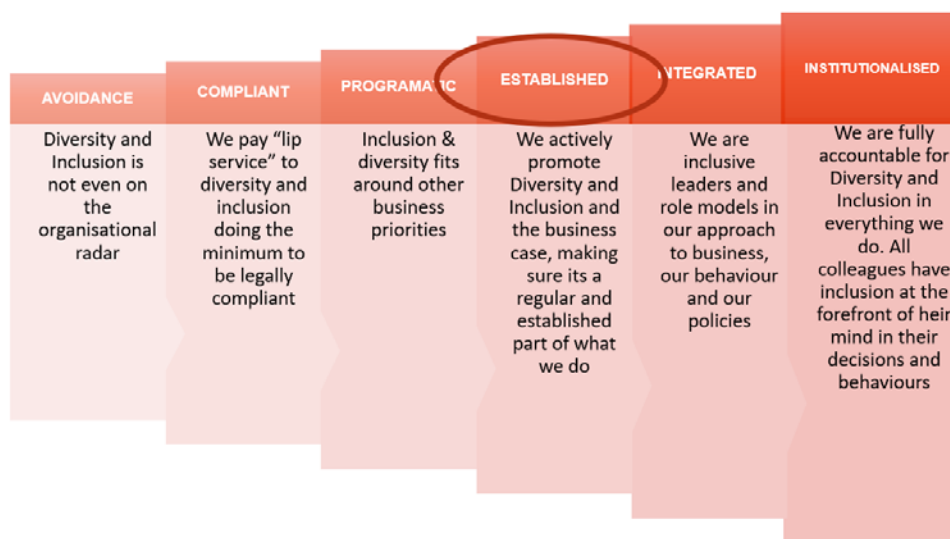
The benchmarking exercise and listening exercises conducted during Summer 2020 established that the Force is at the beginning of its inclusion journey. As shown in the diagrams below, the Force is currently at the 'compliance' stage of the inclusion maturity model:

### Where we are now: Inclusion Maturity Model



The benchmarking exercise found that the Force have a foundation of legal compliance in place, for instance PSED and gender pay gap reporting mechanisms, policies and procedures and staff training. In line with the Force vision to develop an inclusive, high performing workforce to deliver excellent service, we want to have progressed to 'established', moving towards 'integrated' by 2025:

### Where we aim to be by 2024: Inclusion Maturity Model



## The 6 pillars of an inclusive 21<sup>st</sup> century police force

We have framed our progress towards 'established' within 6 inclusion pillars in line with the Inclusive Employers Standard benchmarking audit. As we achieve the actions underneath each pillar we will move along the inclusion maturity model.

<b>Engage</b>	Engage staff (at all levels) to ensure they have a good understanding and awareness of the organisation's vision for diversity and inclusion. Engage with the staff so that the organisation has a good understanding of the employee experience from an inclusion perspective.
<b>Equip</b>	Equip all staff, managers and leaders through training, policies and guidance to build equality, diversity and inclusion into the work they do and the way they work. Equip all staff to help the organisation design and deliver more effective and inclusive policies, processes and services.
<b>Empower</b>	Empower by involving staff through networks, team discussions, Trade Unions and/or other channels. Value the contributions of everyone, including people from under-represented groups and ensuring inclusion and diversity makes a positive difference. Empower by providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities.
<b>Embed</b>	Build a shared responsibility and accountability for achieving improvements by explicitly embedding inclusion and diversity into everything the organisation does. This includes embedding inclusion and diversity into the organisation's corporate strategy, any processes and policies to improve its ability to attract and retain the best talent and through its procurement processes.
<b>Evaluate</b>	Evaluate diversity and inclusion progress to set relevant and achievable interventions/ targets.
<b>Evolve</b>	Evolve by continuously learning and drawing on best practice to devise innovative and creative interventions.

## Achievements so far

- Between 2018 and 2019 we have demonstrated progress in closing our Gender Pay Gap.
- We have continued to increase the amount of diversity data we publish in our Public Sector Equality Duty Report.
- We have reviewed all our Equality, Diversity and Inclusion (EDI) practices to allow more collaborative working with internal and external groups and organisations.
- We have reviewed the Terms of Reference for the Equality & Inclusion Strategic (E&I Strategic) Board which clearly sets out our expectation and responsibilities of all attending members.
- We have introduced a new Equality & Inclusion Operational Delivery (E&I OP Delivery) Board that is chaired by a Chief Superintendent / A/Commander. The E&I OP Delivery Board is attended by all the staff support networks, trade unions, Police Federation, HR, Learning & Organisational development and the Equality & Inclusion Manager. The actions and updates from the E&I OP Delivery Board are directly fed into the E&I Strategic Board for senior leadership support.
- We are re-launching the Superintendents' Scrutiny Group.
- We have recruited a diverse group of people who represent the City of London Residents, City businesses, the transient population and the greater London population, to be part of our new Independent Advisory Scrutiny Group.
- We have improved networking with external stakeholders and businesses, to learn and share new and effective EDI practices. We have introduced workshops and policies to support our employee's development and family life.

- Following the Black Lives Matter movement, we implemented a Gold Group and focus groups, to allow people to share their views and experiences, at work and at home. We will continue to ensure we create an inclusive and supportive environment for our organisation, our community and our partners.

## 2025 - What success looks like within the Force Values

### Force Values

Our values, which encompass the Code's nine principles, underpin everything we do. Adhering to them enables us to demonstrate not only our commitment to the national Police Code of Ethics, but also to deliver it.

**Integrity:** Our behaviour, actions and decisions will always support the public interest and those we work in partnership with. We value public trust and confidence in policing and to earn this we will be open to scrutiny and transparent in our actions. We will respond to well-founded criticism with a willingness to learn and change. We will ensure that the public can have confidence in the integrity of the data used and published by us; we will make sure that all crime is recorded ethically and in accordance with all current guidance.

#### What success looks like: integrity

- Transparent and accountable processes and practices that all staff trust
- Openness to feedback, learning and change to create a culture that includes everyone
- Senior staff that role model genuine inclusion

**Fairness:** We are an organisation that believes in openness, honesty and fairness. We believe in mutual trust and respect, and in valuing diversity in our role both as an employer and as a public service provider. We will support equality by creating an environment that maximises everyone's talents in order to meet the needs of the organisation and those of the community we serve.

#### What success looks like: fairness

- Fair and consistent procedures for recruitment, development and promotion
- A culture of mutual trust and respect between all levels and groups within the force, incorporating zero tolerance for bullying and harassment
- All staff feel they are treated with dignity and respect whatever their job role, identity or background

**Professionalism:** Professionalism is a quality that we value highly. We will investigate crime professionally and thoroughly, doing everything in our power to protect those at the greatest risk of harm. We expect our staff to be



dedicated to professional development, both for themselves and the people they are responsible for, and empowered to use discretion and common sense to make appropriate operational decisions. Our professionalism ensures that we meet the needs and demands of our customers to deliver high quality, fast, effective and efficient services

### What success looks like: professionalism

- Inclusion embedded into everything the force does, including training and development programmes, in line with the professional standards
- Empowered and skilled line managers for every team
- Rigorous mechanisms to report progress and ensure action in EDI

### How we will measure success

As noted previously, there has been significant work in inclusion at the Force, and this strategy is intended to work harmoniously alongside that ongoing work. We have identified the following overarching measures of success that all of this work, and additional actions identified in the action plan, will help achieve:

- Staff surveys demonstrating increasing levels of reported trust in the fairness, integrity, and professionalism of the Force, with the aim of engagement and trust levels being broadly equal across different demographic groups
- Engagement measures showing increased retention, reduced sickness absence, reduced staff complaints and grievances, with no demographic overrepresented within tribunals and grievances
- Increasing levels of staff diversity data disclosure rates, leading to 95% completion by 2025
- Achievement of Inclusive Employers Standard Bronze in 2022, and Silver in 2025
- Achievement of 'Good' assessments by HMICFRS for Legitimacy and any Diversity and Inclusion related inspections.
- Ambition for a workforce that represents the diversity of London, with measurable progress at every level arising from inclusive talent pipelines, positive action and workforce development programmes
- A suite of inclusive policies and procedures written in collaboration with key stakeholders including staff networks

- Provision of Inclusion & Diversity training for all staff, including an Allies programme, and training specifically for line managers to manage inclusive teams
- All staff to have meaningful EDI-themed objectives within their performance review

## Ensuring joined-up working

This strategy outlines the vision for inclusion in the City of London Police to create a high performing and inclusive 21<sup>st</sup> century police force. It is intended to sit above the following action plans for which work is underway:

- Workforce representation plan
- BAME action plan
- NPCC action plans and toolkits

The key to achieving the ambitions and success measures set out in this strategy is to ensure that all the action plans and toolkits are smarter, measurable and achievable. All action plans and toolkits will be reviewed by the D&I committee and working group with a view to ensure work is joined-up, lessons learnt are shared and work is not duplicated. We will, therefore, produce one action plan, incorporating existing D&I related plans together with the success measures in this strategy. This will allow us to track our progress delivering this strategy, report that progress in a transparent manner and be held to account by our governing bodies.

The diagram below outlines how the workstreams sit underneath the strategy. The Force has made good progress in establishing working groups and action plans for specific areas of work, and we want the actions identified from the benchmarking exercise to be woven into these existing workstreams:

<b>E&amp;I strategy and vision</b>		
<b>NPCC plan and working group: our organisation</b>	<b>NPCC plan and working group: our communities</b>	<b>NPCC plan and working group: our partners</b>
<b>Workforce representation plan working group</b> <b>BAME action plan working group</b> <b>Annual gender and race pay gap reports and PSED<sup>2</sup> report</b>		
<b>Additional working groups as required</b>		

These working groups sit within the existing oversight mechanisms as detailed in the next section.

<sup>2</sup> Public Sector Equality Duty

## Force oversight and governance groups

**Commissioner** The Commissioner is the Force Lead for Equality and Inclusion and approves the Force Strategy to drive through the organisation maintaining oversight of its implementation.

**Police Authority Board** The Police Authority Board hold Chief Officers accountable for Force performance and will receive updates on the progress of strategy implementation.

**Police Authority Board Lead** The Police Authority Board appoint a Lead Member for Equality & Inclusion who sits on the Force Equality & inclusion Board to retain oversight of this area of work.

**Independent Advisory Scrutiny Group** These are engaged to inform and develop the Force work in Equality and Inclusion providing independent advice and guidance for the Force to consider.

**Equality & Inclusion Board** This board oversees the implementation of the Force Equality & Inclusion Strategy and is chaired by the Assistant Commissioner.

**Equality & Inclusion Operational Board** This board sits under the Equality & Inclusion Board to ensure that all operational and implementation of equality, diversity and inclusion activities are being delivered. The Board is chaired by the Assistant Commissioner's nominated senior lead of at least Chief Supt rank/equivalent Staff Grade.

**Equality & Inclusion Manager** The Force dedicated resource for implementing and embedding EDHR principles within all that we do.

**Diversity Champions** These are appointed within Force to assist in the implementation of our Equality & Inclusion Dashboard.

**Support Networks** Our support networks will be engaged to capture how the work they do will support the implementation of our strategy and inform the development of our measures of success.

- Black Police Association
- Christian Police Association
- Disability Enabling Network

- LGBT Support Network
- Muslim Police Association
- Women's Network
- Health and Wellbeing Network
- The Men's Network

## Appendix:

The following appendices form the context from which this strategy was written. We have included them here for reference.

### National Police Chiefs Council NPCC

National Police Chief's Council (NPCC) brings police forces in the UK together to help policing coordinate operations, reform, improve and provide value for money. Some of the biggest threats to public safety are national and international. The NPCC have a collective strength by coordinating the operational response across forces. The NPCC Diversity, Equality and Inclusion Committee developed a national strategic response and worked with The National Centre for Social Research to provide an evidence base to enable greater workforce diversity and effective service delivery across communities. This strategy gives clarity of leadership and action that is required by the police service across **three categories; our organisation, our communities and our partners**. Embedding diversity, equality and inclusion into all that we do is an essential ingredient for success and fundamental to this is an effective co-ordination committee that influence our work within the NPCC and through into individual organisations.

### Force Equality Duty

As a public sector organisation the Force has a duty set out within the Equality Act 2010 to protect people from discrimination in the workplace and within society in general. We are required to comply with this legislation and in particular section 149 of this Act that sets out the Public Sector Equality Duty. This duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between different people when carrying out their activities.

The Equality Act 2010 sets out 9 protected characteristics that we must consider as part how we work and deliver our services.

Age

Disability

Sex

Gender Reassignment

Marriage & civil Partnership

Pregnancy & Maternity

Race

Religion or Belief

Sexual Orientation

We have a duty to publish information on these characteristics to show compliance with the Equality Act 2010. Data on these will be captured within our NPCC Equality and Inclusion Toolkit and reported for senior managers to monitor and action. Every quarter the Force provide the Professional Standards and Integrity Committee (a sub Committee of the Police Authority Board) with an Equality report which is published on the City of London Corporation's website.

## **National Police Code of Ethics**

There are ten standards of professional behaviour. These standards reflect the expectations that the professional body and the public have of the behaviour of those working in policing. They originate from the Police (Conduct) Regulations 2012 (for police officers) and the Police Staff Council Joint Circular 54 (for police staff). The Code has adapted the wording in the Regulations and Circular 54 so that it applies to everyone. The Code of Ethics, sets out the code of practice for the principles and standards of professional behaviour for the policing profession of England and Wales.

### **1. Honesty and integrity**

I will be honest and act with integrity at all times, and will not compromise or abuse my position.

### **2. Authority, respect and courtesy**

I will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy. I will use my powers and authority lawfully and proportionately, and will respect the rights of all individuals.

### **3. Equality and diversity**

I will act with fairness and impartiality. I will not discriminate unlawfully or unfairly.

#### **4. Use of force**

I will only use force as part of my role and responsibilities, and only to the extent that it is necessary, proportionate and reasonable in all the circumstances.

#### **5. Orders and instructions**

I will, as a police officer, give and carry out lawful orders only, and will abide by Police Regulations. I will give reasonable instructions only, and will follow all reasonable instructions.

#### **6. Duties and responsibilities**

I will be diligent in the exercise of my duties and responsibilities.

#### **7. Confidentiality**

I will treat information with respect, and access or disclose it only in the proper course of my duties.

#### **8. Fitness for work**

I will ensure, when on duty or at work, that I am fit to carry out my responsibilities.

#### **9. Conduct**

I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing.

#### **10. Challenging and reporting improper behaviour**

I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.



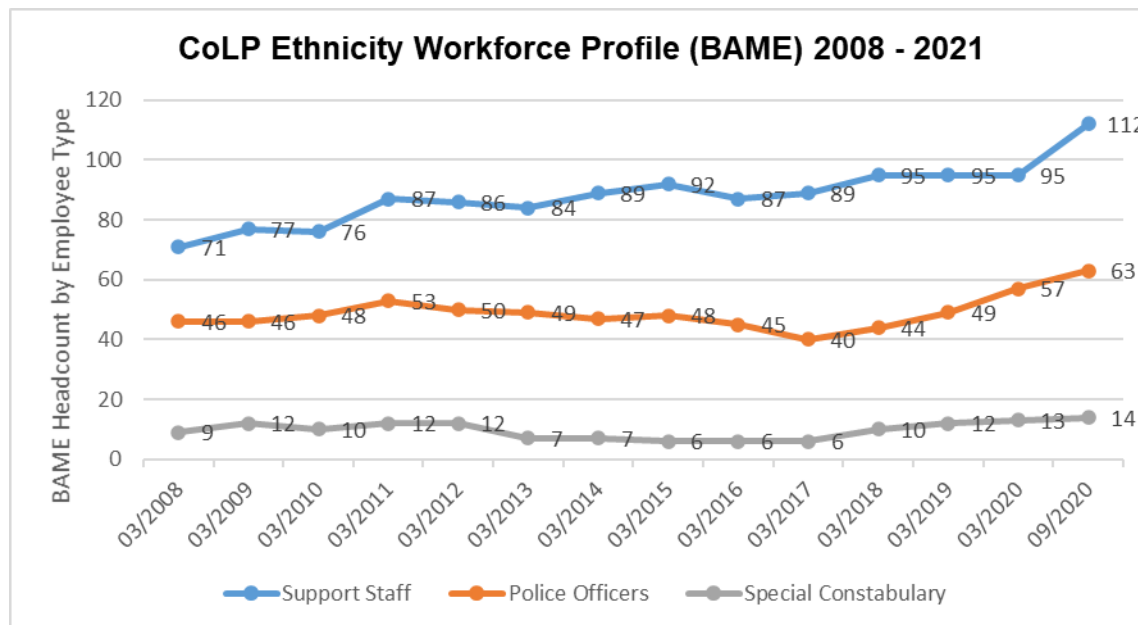
## Equality and Inclusion Update to PSI- Appendix 2

### BAME and Gender Workforce information<sup>1</sup>

#### Ethnicity

1. For this reporting period (1<sup>st</sup> April 2020 to 30<sup>th</sup> September 2020), the number of BAME Police Officers has increased to 63 (57 previously reported) and the number of Police Staff has increased to 112 (95 previously report). The graph below represents the number of Black, Asian and Minority Ethnic (BAME) Police Staff, Officers and Special Constabulary within the CoLP by financial year from 2008 to 2020.
2. When compared nationally CoLP is ranked as second highest among all National forces (not including BTP) for BAME Staff representation rates and is fifth highest for officer representation (not including BTP).
3. The Force continues to support delivery of the BAME aspects of the new E&I Action Plan which is based on the national NPCC Workforce Representation, Attraction, Recruitment, Progression & Retention Delivery plan, which will drive further changes in this area. The Force, as an example, is advertising more widely and is supporting internal applicants through application writing and interview workshops. The Force's Equality & Inclusion Operational Board continues to oversee the work on these plans and how BAME representation can be encouraged further in the force.

#### CoLP Workforce Profile by Ethnicity 2008-2021 (financial year)



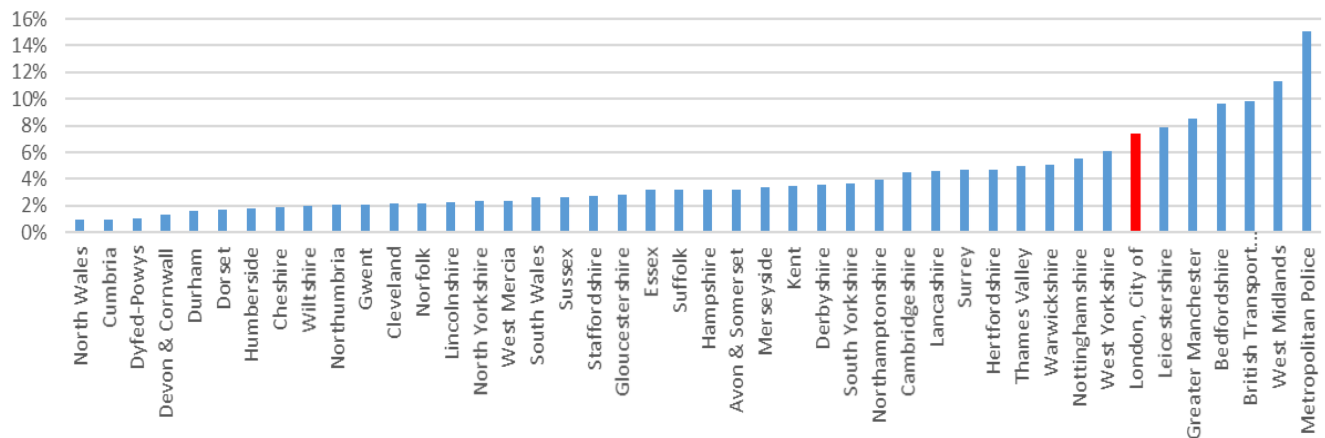
\*Note: 09/2020 represents half 2020/21 financial year.

<sup>1</sup> NB: This information was also reported to your Police Performance and Resource Management Committee on the 11th November 2020 as part of the HR Monitoring Report 1<sup>st</sup> April – 30<sup>th</sup> September 2020

## Officer BAME representation - National Comparison

(National Statistics Police workforce open data tables March 2020)

### BAME Officers (% of Headcount) - 31 March 2020

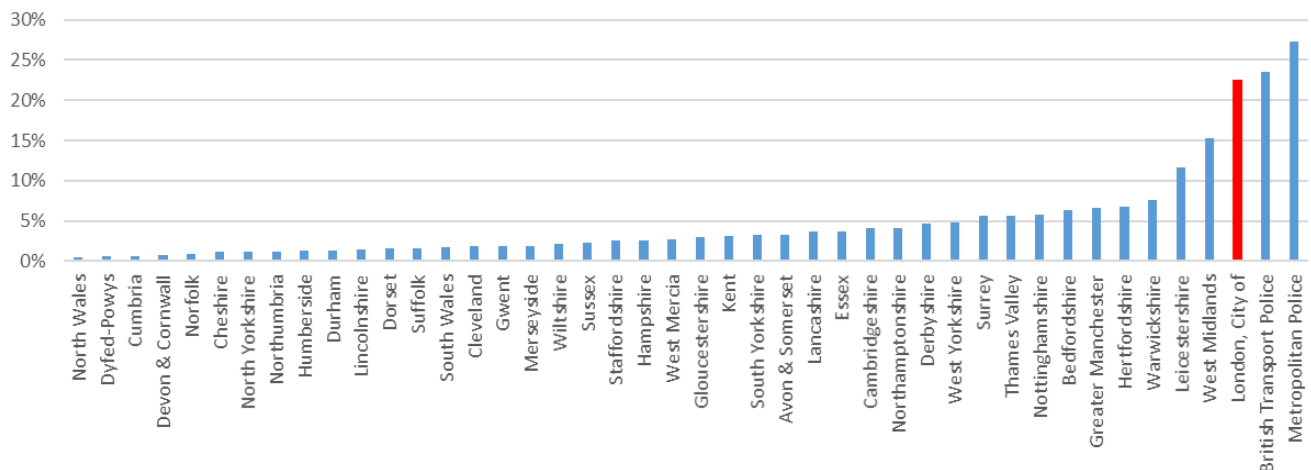


Source: Police Workforce, England and Wales, 31 March 2020

## Staff BAME representation - National Comparison

(National Statistics Police workforce open data tables March 2020)

### BAME Staff (% of Headcount) - 31 March 2020



Source: Police Workforce, England and Wales, 31 March 2020

## Gender

- The percentage of female Police Officers has continued to increase since 2018. As part of 2018-2023 People Strategy, CoLP is continuing to undertake a number of activities to improve female representation. Approximately 23% of applications received for Police Officer roles were

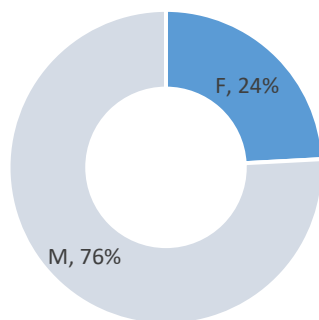
from female applicants; 30% of Police Officer new joiners were female in the reporting period.

5. The national average for female Police Staff stands at 62% as at 31 March 2020, as of September 2020 CoLP's female Police Staff representation rate is 57.9%. It is worth noting that the force has a more even representation of male and female Police Staff.

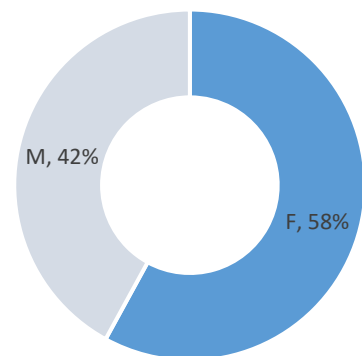
## Gender Comparison

- City of London – September 2020
- National Comparison (England and Wales) - March 2020

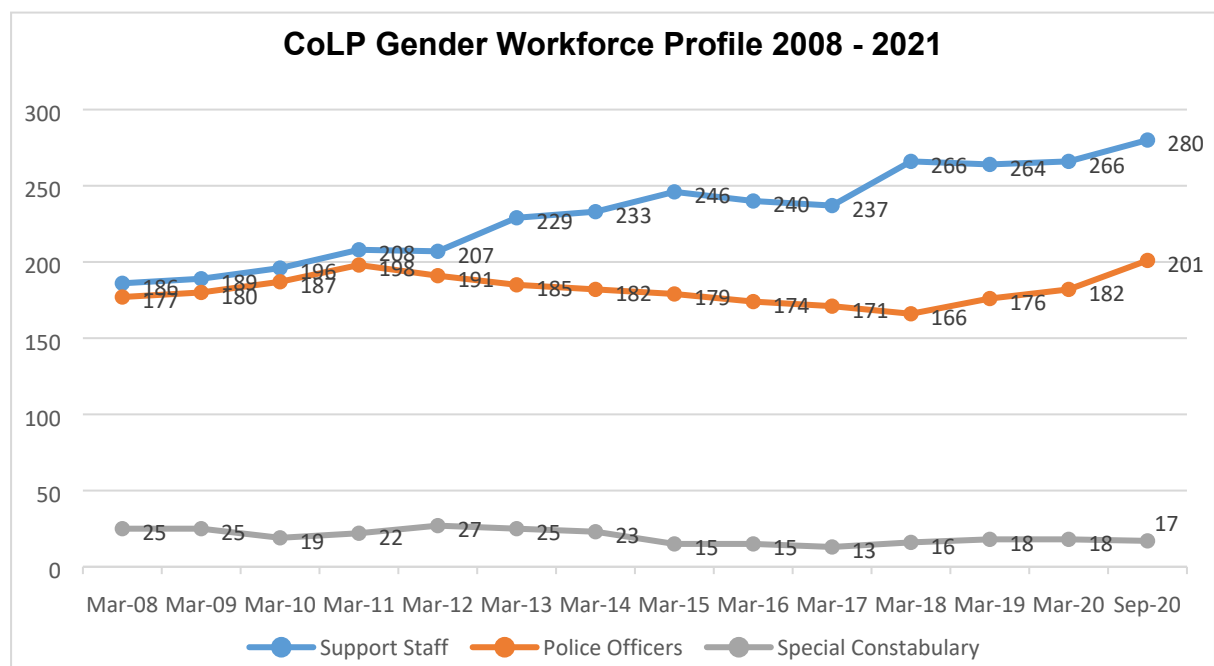
Officer Gender Profile



Staff Gender Profile



## Workforce Female Gender Profile – 2008-2020



\*Note: 09/2020 represents half 2020/21 financial year.

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<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date:</b> 26 <sup>th</sup> November 2020
<b>Subject:</b> Integrity and Code of Ethics Update	<b>Public</b>
<b>Report of:</b> Assistant Commissioner	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

### *Integrity Standards Board:*

The Force's Integrity Standards Board (ISB) last met on 18<sup>th</sup> November 2020. As it takes place immediately before your Committee's deadline for papers, a verbal update will be provided to Members at your meeting; the draft dashboard, however, is attached for Members' information.

### *Code of Ethics Update:*

The last reported situation regarding the London Police Challenge Forums (LPCF) remains the same, with none having been held since December 2019. A date was scheduled for April 2020 for a re-launch of the LPCF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown. The Head of Strategic Development has discussed this situation with the Metropolitan Police Service (MPS) Co-ordinator of the LPCF, and the intention is to hold a meeting in January 2021. A date will be circulated to Members when set so that any Member who wishes to observe or take part in the event can do so.

The Regional and National meetings have managed to operate remotely, with discussions continuing to be dominated by issues relating the Covid-19 situation (e.g. the impact on the quality of decision making in the face of rapidly shifting priorities, changing to legislation and enforcement of guidance). The last national meeting was held on 13<sup>th</sup> October and covered such items as the national Code of Ethics refresh, how forces are implementing the national sexual harassment in the workplace guidance and the burgeoning digital and data ethics landscape. The last regional meeting was held on 8<sup>th</sup> October 2020. Although scheduled as a meeting, it was in fact run as an online 'conference' with presentations from a number of individuals, that included the Chairman of Standards in Public Life Committee and a retired Colonel from Sandhurst

The Integrity Standards Development Plan has been reviewed by the Head of Strategic Development and was accepted by the last ISB held on 15<sup>th</sup> September 2020. It is appended to this report for Members' information.

The plan includes progress against areas for improvement (AFIs) identified by HMICFRS<sup>1</sup> that are relevant to the PS&I Committee. Only 1 action that has been rolled forward is now RED, and relates to the introduction of new software in Force.

### **Recommendation(s)**

Members are asked to note the report.

### **Main Report**

#### **Current Position**

##### ***Integrity Standards Board***

1. The Integrity Standards Board (ISB) was constituted to monitor the dashboard on a quarterly basis and to consider other issues relating to integrity. The Board is chaired by the Assistant Commissioner and is attended by the Chairman of the Professional Standards and Integrity (PS&I) Committee and a representative from the Town Clerk's department.
2. The Force's Integrity Standards Board (ISB) last met on 18<sup>th</sup> November 2020. As it takes place immediately before your Committee's deadline for papers, a verbal update will be provided to Members at your meeting; the draft dashboard, however, is attached for Members' information.

##### ***Code of Ethics Update***

3. The last reported situation regarding the London Police Challenge Forums (LPCF) remains the same, with none having been held since December 2019. A date was scheduled for April 2020 for a re-launch of the LPCF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown. The Head of Strategic Development has discussed this situation with the Metropolitan Police Service (MPS) Co-ordinator of the LPCF, and the intention is to hold a meeting as early in 2021 as possible, with aim being during January 2021. A date will be circulated to Members when set so that any Member who wishes to observe or take part in the event can do so.
4. The last report to your Committee noted that the Head of Strategic Development had taken part in an online meeting with the Institute of Business Ethics (IBE), who has developed a new ethics training guide for use by private and public sector organisations. It was anticipated that the guide would be published by the end of 2020, however, publication has now been rescheduled to Spring 2021 whilst the IBE concentrates on supporting businesses with the ongoing impact of Covid.

#### ***Regional Police Ethics Network and UK Police Ethics Guidance Group***

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<sup>1</sup> Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services

5. The Regional and National meetings have managed to operate remotely, with discussions continuing to be dominated by issues relating the Covid-19 situation (e.g. the impact on the quality of decision making in the face of rapidly shifting priorities, changing to legislation and enforcement of guidance).
6. The last national meeting of the UK Police Ethics Guidance Group (UKPEGG) was held on 13<sup>th</sup> October, where the outgoing Chair (DCC Dorset Police) handed over the reins to the new Chair, the Chief Constable of Cleveland Police. Items discussed included:
  - i. Refresh of the national Code of Ethics – this is still at a very early stage. Initial consultation is currently taking place between the College of Policing, Home Office, IOPC<sup>2</sup>, NPCC<sup>3</sup> and APCC<sup>4</sup> to agree the terms of the review. Once that is complete, work will commence to procure an independent body to conduct the review that will ultimately lead to proposals for a reformed Code of Ethics.
  - ii. Regional leads updated the national group on what their forces had been doing to implement the national sexual harassment in the workplace guidance. For Members' benefit, the City of London Police has raised awareness of this issue through the intranet and video information films.
  - iii. A major paper on the rapidly expanding digital landscape that impacts policing was recently discussed at the Chief Constables' Council. The UKPEGG considered that paper so that it could formally respond. It was noted that whilst consideration of the ethics of digital policing in all its forms had commenced, the impact of Covid has resulted in decreased activity or momentum in this area, and work needs to recommence at a national level, through the regions. The Chair of the UKPEGG will follow this up with the various NPCC leads for the different elements of digital policing.
  - iv. The UKPEGG noted that whilst it provides the forum for police forces (and other organisations) to discuss and debate ethical dilemmas and issues, the timing of these are often post event and reviewed retrospectively. It therefore considered ways it could be more agile in its approach to debating ethical issues as they arise. It was felt the best proposal would be to have a small cohort of UKPEGG members (of suitable rank and vetting status) who would make themselves available at short notice to take part in online discussions in real time about ongoing events ahead of decisions being made.

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<sup>2</sup> Independent Office for Police Complaints

<sup>3</sup> National Police Chiefs' Council

<sup>4</sup> Association of Police and Crime Commissioners

7. The last regional meeting was held on 8<sup>th</sup> October 2020. Although scheduled as a meeting, it was in fact run as an online 'conference' with presentations from a number of individuals, that included the Chairman of Standards in Public Life Committee and a retired Colonel from Sandhurst.

### ***Integrity Standards Development Plan***

8. The Integrity Standards Development Plan which is attached for Members' information, was accepted by the ISB at its meeting on 15<sup>th</sup> September.
9. Members will note the RED assessment in measure 2.4. This relates to one specific aspect of this measure, which is the inclusion of PSD-related software in Force. An original deadline of September 2020 was introduced, but implementation was delayed for 2 reasons: the first was caused by issues with the roll out of Windows 365, the second has been that extensive testing is required before it can be safely used in Force. A revised timeline is being determined and Members will be able to receive a verbal update on this from the Detective Superintendent PSD at your Committee.

### **Stuart Phoenix**

Head of Strategic Development

T: 020 7601 2213

E: [Stuart.Phoenix@cityoflondon.pnn.police.uk](mailto:Stuart.Phoenix@cityoflondon.pnn.police.uk)



**CITY OF LONDON POLICE**

**DRAFT INTEGRITY  
DASHBOARD 2020/21  
Quarter 2**  
Version 1.0



## Rationale for Integrity Dashboard

The Integrity Dashboard will report on indicators designed to monitor how the Force is delivering the Police Code of Ethics and highlight behaviour of staff that may not meet the standards set out within the code. The code of ethics is detailed below for reference within this document.

### Police Code of Ethics:

**1. Honesty and integrity**

I will be honest and act with integrity at all times, and will not compromise or abuse my position.

**2. Authority, respect and courtesy**

I will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.

I will use my powers and authority lawfully and proportionately, and will respect the rights of all individuals.

**3. Equality and diversity**

I will act with fairness and impartiality. I will not discriminate unlawfully or unfairly.

**4. Use of force**

I will only use force as part of my role and responsibilities, and only to the extent that it is necessary, proportionate and reasonable in all the circumstances.

**5. Orders and instructions**

I will, as a police officer, give and carry out lawful orders only, and will abide by Police Regulations.

I will give reasonable instructions only, and will follow all reasonable instructions.

**6. Duties and responsibilities**

I will be diligent in the exercise of my duties and responsibilities.

**7. Confidentiality**

I will treat information with respect, and access or disclose it only in the proper course of my duties.

**8. Fitness for work**

I will ensure, when on duty or at work, that I am fit to carry out my responsibilities.

**9. Conduct**

I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing.

**10. Challenging and reporting improper behaviour**

I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.

## Public Confidence Indicator

FORCE INTEGRITY INDICATORS							
Number	Indicator		2019 Survey Results				
PC 1	Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity.	Survey Type and number of respondents	Percentage Strongly Agree	Percentage Tend to Agree	Percentage Neither Agree or Disagree	Percentage Tend to Disagree	Percentage Strongly Disagree
		Street (519)	41	52	6	1	0
		Online (103)	53	38	8	2	0
			2020 Survey Results				
		Survey Type and number of respondents	Percentage Strongly Agree	Percentage Tend to Agree	Percentage Neither Agree or Disagree	Percentage Tend to Disagree	Percentage Strongly Disagree
		Street (000)	N/A	N/A	N/A	N/A	N/A
		Online (580)	48	38	10	3	2
<b>Rationale:</b> This question is asked as part of the public survey and will identify if the Force needs to take action to address how it is perceived by the public. The integrity question asked on the survey will allow the Force to review feedback and address any comments as part of its planning process.							
The measure will also look to monitor any perception that the public may have of the Force as a result of dealings with officers or through word of mouth and analysis of any comments made by the public will be provided here for additional context.							
<b>Analysis - The following information has been supplied by Strategic Development:</b> Full analysis of the survey data and comments have yet to be undertaken however the preliminary data above shows that 86% of the respondents believed that officers would act with integrity. This is compared to 93% from the street survey last year and 93% from the online responses. This shows a reduction in the perception of integrity of officers by the public. This year also saw a 2% perception that strongly disagreed that officers would act with integrity that was not shown in any responses last year.							
Respondents have the opportunity to comment on their perception of the police which is a section that includes 5 perception questions. As yet these comments have not been reviewed to identify if any integrity issues were flagged by respondents to better understand the responses given and build in a plan to act around public perception and confidence around officers and Force actions.							

FORCE INTEGRITY INDICATORS						
Number	Indicator	2020 Survey Results				
PC 2	Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you	Percentage of respondents that felt	Q1 Number of respondents & satisfaction %	Q2 Number of respondents & satisfaction %	Q3 Number of respondents & satisfaction %	Q4 Number of respondents & satisfaction %
		Were fair in the way they dealt with you				
		Treated you with respect				
	<p><b>Rationale:</b> The victim satisfaction survey is undertaken quarterly to assess how the Force deals with victims of crime. The question on how victims were treated by our staff will allow the Force to identify if officers and staff are following the code of ethics for behaviour when dealing with victims of crime.</p> <p>Victims are likely to be upset and distraught when initial police contact occurs and their perception of their treatment will reflect how officers and staff have been trained to deal with the public in what can be difficult and upsetting circumstances.</p> <p><b>Analysis - The following information has been supplied by Strategic Development:</b> A new contract has been awarded by PIU to undertake the victim satisfaction survey on behalf of the force, data collection commenced on 1<sup>st</sup> November to inform this measure going forward.</p>					

## HR Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	Number of Upheld Grievances Relating to Integrity					Number of Upheld Grievances Made Per Quarter				
HR 1	Number of Grievances registered with HR Relating to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0			0
	Rationale: To monitor the number and themes of grievances investigated within Force to note any potential Code of Ethics issues.										
	Historical Data: 2015/16: 7 Grievances 2016/17: 13 Grievances 2017/18: 8 Grievances 2018/19: 15 Grievances 2019/20: 16 Grievances										
Analysis - The following information has been supplied by the Head of HR: During the second quarter we have had no new grievance cases at all and no outstanding grievance concluded. We have noticed since COVID19 lockdown case work has reduced whilst people have been working remotely. In some cases there have been delays in concluding cases due to various participants not being available due to COVID19 and planned leave.											
Number	Indicator	Number of employment Tribunals Relating to Integrity					Number of Employment Tribunals held Per Quarter				
HR 2	Number of Employment Tribunals that cite Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0			0
	Rationale: To monitor the number and allegations of tribunals to note any potential Code of Ethics issues.										
	Historical Data: 2015/16: 0 Tribunals 2016/17: 2 Tribunals 2017/18: 2 Tribunals 2018/19: 1 Tribunal 2019/20: 2 Tribunals										
Analysis - The following information has been supplied by the Head of HR: We have had no new ETs submitted or attended any planned ET during this period. We have had a Judicial Mediation at the end of the period related to Constructive Dismissal (Challenging and reporting improper conduct/Duties and responsibilities). This was not successful so we will move to an ET in the New Year.											

Number	Indicator	Number of leavers per quarter					Number of leavers stating Integrity as a reason for leaving the organisation				
HR 3	Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		8	20			28	0	0			0
	Number of Support Staff Leavers stating Code of Ethics Issues as a reason for leaving the organisation	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		11	11			22	0	0			0
<b>Rationale:</b> This will monitor the number of Force leavers (police & support staff) for each quarter and identify if there are any trends through exit interviews that are linked to Code of Ethics for why staff are leaving the organisation.											
<b>Analysis - The following information has been supplied by the Head of HR</b> Of the 20 Police Officer Leavers in Quarter 2 : 13 were for Normal retirement, 2 were transfers to other Forces and 5 were for voluntary resignations Of the 11 staff leavers in Quarter 2: 1 was for dismissal as a result of unsatisfactory Probationary period, 8 were voluntary resignations and 2 Normal retirement.  In terms of Exit interviews only 4 were completed during this period ( 2 x Officers and 2 x Staff ) One member of staff referred to discrimination/harassment by their line manager – This had already been investigated under the grievance process with decision only to partially uphold one element.											
Number	Indicator	Number of dismissals per quarter									
HR 4	Number of Dismissals as a result of Code of Ethics Issues	QTR 1		QTR 2		QTR 3		QTR 4		Total	
		0		0						0	
<b>Rationale:</b> This will monitor the number of dismissals (police & support staff) for each quarter and identify if there are any trends that are linked to Code of Ethics for why staff are being dismissed.											
<b>Analysis - The following information has been supplied by the Head of HR:</b>  In Quarter 2 there were no Dismissals of Police staff as a result of Code of ethics. The only Dismissal as recorded above was for unsatisfactory probationary period which was performance not conduct.											

## Finance Indicators

Number	Indicator	Number of Procurement cards that are compliant					Number of referrals to PSD/HR for Honesty & Integrity investigation issues as a result of procurement card use				
		YEAR	QTR 1	QTR 2	QTR 3	QTR 4	QTR 1	QTR 2	QTR 3	QTR 4	Total
FIN 1	Procurement card misuse that relates to Code of Ethics Issues	2019	2775	3021	3681	3249	0	0	0	0	0
		YEAR	QTR 1	QTR 2	QTR 3	QTR 4	QTR 1	QTR 2	QTR 3	QTR 4	Total
		2020	1077	1979			0	0			0
		<p><b>Rationale:</b> Force staff following a standard process for the use of their procurement cards which requires sign off of transactions by line managers as well as receipt of goods to track use within agreed parameters. The number referrals per quarter will be reported against the number of staff who are compliant in their use.</p> <p><b>Analysis - The following information has been supplied by the Finance Business Transformation &amp; Performance Manage):</b></p> <p>Reports from quarter 1 and 2, show a compliance of 88% and 91% respectively.</p> <p>No referrals have been made to PSD or HR for honesty and integrity issues.</p>									

## Learning & Development Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	# Disclosure Courses Undertaken within Quarter					Total Number of Officers Trained in Disclosure				
L&D 1	Mandatory Code of Ethics Training Given as part of existing Courses	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	22			22
		# Stop & Search Courses Undertaken within Quarter					Total Number of Officers Trained in Stop & Search				
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0				0
		# Vulnerability Courses Undertaken within Quarter					Total Number of Officers Trained in Vulnerability				
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0				0
<b>Rationale:</b> To show how many officers are receiving training on Code of Ethics as part of their courses. The information will be taken from the L&D Dashboard showing the number of courses within the quarter and the overall number of staff trained.											
<b>Analysis - The following information has been supplied by L&amp;D:</b> All non-essential training (everything but IPLDP) was cancelled after 23 March 2020. All non-essential training (everything but IPLDP) was cancelled after 23 March 2020. The majority of the force have been captured in the previous 2 years for Disclosure, Stop & Search and Vulnerability training. Disclosure training is to be reviewed and renewed in 2021.											
Number	Indicator										
L&D 2	Other Code of Ethics Issues Training Input										
<b>Rationale:</b> L&D provides input on an ad-hoc basis to supplement training courses to implement national guidance or learning best practice from within Force. Where additional input has been made on Code of Ethics with courses within a quarter a text response will provide oversight into what has occurred and why so that ISB received an update on the wider Code of Ethics training and input made by Learning and Development within quarter.											
<b>Analysis - The following information has been supplied by L&amp;D</b>											
As part of Sergeants Core Leadership course we talk about the Code of Ethics as part of a number of the lessons.											
2 x Silver Command courses are to be run in December 2020 aimed at C/Insp and Supt. There is an emphasis on the NDM including an in-depth look at the Code of Ethics and their impact of decision making.											
PSD completed a ‘focus on’ in September to inform regarding the new PRI system and ethical use of this. This was well received and is due to be delivered to the FRC this month 16 officers received Tutor Constable training over 5 sessions.											



## PSD Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	Number of Complaints Made Per Quarter					Number of Allegations Made per Quarter				
PSD 1	Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		39	24			63	58	47			105
		Number of Complaints Upheld Per Quarter					Number of Allegations Upheld Per Quarter				
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	0			1	1				1
		Number of Upheld Complaints Relating to Integrity					Number of Upheld Allegations Relating to Integrity				
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0	0		0
<p><b>Rationale:</b> Monitoring the number of complaints and allegations will allow the Force to identify if there are specific trends that may require management action to address, this could identify the need to amend processes or Force culture depending on the nature of the complaints received. Each complaint made may have a number of associated allegations so monitoring this will allow the overall volume of work undertaken by PSD to be revealed.</p> <p><b>Historical Data:</b> 2015/16: 105 Complaints 2016/17: 102 Complaints 2017/18: 90 Complaints 2018/19: 54 Complaints 2019/20: 78 Complaints</p> <p><b>Analysis - The following information has been supplied by PSD:</b></p> <p>There has been an increase in the number of complaints and allegations made in comparison to previous years. This is consistent with the natural picture and although we may have expected a reduction due to the drop in footfall across the City, the year-on-year trend has continued to increase. There are a number of explanations for this including an increased accessibility through single online reporting. As the Force continues to grow its workforce it is also expected that there will be a correlation in increased allegations made.</p>											
Number	Indicator	Number of Cases Per Quarter					Number of Cases Relating to Integrity				
PSD 2	Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		7	2			9	0	0			0
<p><b>Rationale:</b> Civil cases include Civil Claims, Judicial Reviews, Employee Liability, Liable and Slander, and Professional Indemnity. Claims are generally covered by insurance and do not represent a financial loss to the force, although outcomes are considered for reputational risk and learning for any impact of operational strategy and effectiveness.</p> <p><b>Historical Data:</b> 2015/16: 23 Cases 2016/17: 17 Cases 2017/18: 18 Cases 2018/19: 23 Cases 2019/20: 15 Cases</p> <p><b>Analysis - The following information has been supplied by PSD:</b></p> <p>There were 2 Civil Claims registered, neither relate to integrity matters. One was for a dog bite which had been dealt with through the complaints process and not upheld, the other was a claim for loss of property.</p>											

Number	Indicator	Number of Cases Per quarter				
PSD 3	Cases of Abuse of Authority for Sexual Gain	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0
	<b>Rationale:</b> This is a serious integrity matter that is of concern at a national policing level. The reporting of this will provide perspective on whether or not the Force is being transparent with reporting and monitoring this issue and breach of public trust.					
<b>Analysis - The following information has been supplied by PSD:</b> There have been no reports this quarter or indeed this financial year. Due to the reduced presence of CoLP within police establishments, this does reduce the opportunity of such abuse. Nationally, this area is identified as being the biggest Strategic Risk area for CCUs to tackle, consequently it has been a focus within the CoLP CCU Control Strategy and proactive work by the PSD Engagement Officer.						

Number	Indicator	Number of Misconduct Proceedings Per Quarter					Number of Misconduct Proceedings that relate to Honesty & Integrity				
PSD 4	Misconduct Proceedings that relate to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0				0	0				0
	<i>Rationale:</i> Misconduct proceedings are a result of proven allegations or investigations by PSD into other areas of officer behaviour such as Gifts & Hospitality, Business Interests or Procurement. The number of misconduct hearings per quarter will be reported against the number relating to Police Code of Ethics.										
	<i>Analysis - The following information has been supplied by PSD):</i> There have been no reports this quarter or indeed this financial year.										
Number	Indicator	Number of Reports Per Quarter					Number of Reports that Result in a PSD Investigation				
PSD 5	Number of internal referrals to PSD (i.e. BadApple)	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		10	1			11	10	1			11
	<i>Rationale:</i> To capture the use of the Force internal systems and identify if staff feel confident in using the processes or if there are issues with their use and adoption in Force.										
	<i>Analysis - The following information has been supplied by PSD):</i> These are matters that have been logged and are being considered or scoped by the covert team. Where appropriate they are assessed for conduct whence, they are transferred to the overt investigation team if recorded. No conduct cases where recorded during this period.										
Number	Indicator	Number of Random Tests Per Quarter					Number of Positive Tests Per Quarter				
PSD 6	Quarterly Random Drug Testing	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		24	18			42	0	0			0
	<i>Rationale:</i> To ensure Police Officers are tested as part of the Force random drug testing policy so that there are no issues with the misuse of drugs within the workforce.										
	<b>Historical Data:</b> 2016/17: 0 Positive Tests 2017/18: 0 Positive Tests 2018/19: 0 Positive Tests 2019/20: 0 Positive Tests										
<i>Analysis - The following information has been supplied by PSD):</i> A recent random drug test has completed with all involved having negative results.											

## Corporate Communications Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	Number of Media Contact Recorded within Quarter					Number Referred to PSD for notice				
CC 1	Number of unauthorised media contacts referred to PSD	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0			0
	<i><b>Rationale:</b> Corporate Communications are in a position to identify any unusual contact with the media by police officers and staff which could lead to compromise or corruption, or be unethical or unprofessional and may be reported to PSD for investigation or intelligence.</i>										
	<b>Historical Data:</b> 2019/20: 0										
	<b>Analysis - <i>The following information has been supplied by Corporate Communications:</i></b>  No referrals were made by Corporate Communication for this period.										

## Data Owners and Sources

No. 1	Indicator	Owner	Data Source
PC 1	Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity.	Strategic Development	Strategic Development
PC 2	Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you	PIU	PIU
HR 1	Number of Grievances registered with HR Relating to Code of Ethics Issues	HR	HR
HR 2	Number of Employment Tribunals that cite Code of Ethics Issues	HR	HR
HR 3	Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation	HR	HR
	Number of Support Staff Leavers stating Integrity as a reason for leaving the organisation	HR	HR
HR 4	Number of Dismissals as a result of Code of Ethics Issues	HR	HR
FIN 1	Procurement card misuse that relates to Code of Ethics Issues	FIN	FIN
L&D 1	Code of Ethics Training Given as part of existing Courses	L&D	L&D Monthly Dashboard
L&D 2	Other Code of Ethics Issues Training Input	L&D	L&D Monthly Dashboard
PSD 1	Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics	PSD	PSD
PSD 2	Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues	PSD	PSD
PSD 3	Cases of Abuse of Authority for Sexual Gain	PSD	PSD
PSD 4	Misconduct Proceedings that relate to Code of Ethics Issues	PSD	PSD
PSD 5	Number of BadApple Reports	PSD	PSD
PSD 6	Quarterly Random Drug Testing	PSD	PSD
CC1	Number of unauthorised media contacts referred to PSD	Corporate Communications	Corporate Communications

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21 November 2020 update**



## INTRODUCTION

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations introduced by the (then) ACPO Police Integrity Maturity Model, supports the continued embedding of the national Police Code of Ethics and implements improvements to ethics and integrity in the Force in line with national requirements and best practice.

## PLAN SUMMARY

1. Commit Measures	Traffic Light Tracker			
	Feb 20	Jun 20	Sep 20	Nov 20
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN	GREEN
1.2 Maintain the Force Integrity Delivery Plan	GREEN	GREEN	GREEN	GREEN
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN	AMBER	GREEN	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN	GREEN	GREEN	GREEN
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN	GREEN	GREEN	GREEN
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN	GREEN
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN	GREEN

2. Development Measures	Traffic Light Tracker			
			Sep 20	Nov 20
<b>NEW MEASURES FROM SEPTEMBER 2020</b>				
2.1 Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics			NEW	AMBER
2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference			NEW	AMBER
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements			NEW	WHITE
2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published ( <i>carried forward</i> )			AMBER	RED

## PERFORMANCE REPORT

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AMBER	Current projections indicate this measure will not be met unless this additional action taken
RED	No progress on measure or deadline/level has not been met and it is unlikely will be met.
WHITE	Due date not reached

### Target Report Checklist

- Current level of achievement
- Dates for work completed
- Dates future work will be completed by (milestones)
- Reasons for current achievement level
- Any risks that have been realised
- Work undertaken to manage realised risk
- Work to be undertaken to manage risk against target
- Impact of other indicators on this work area
- A statement from owner about whether they think the measure will or will not be achieved by the due date based on the information provided above.

**COMMITMENT DASHBOARD** – These indicators represent provisions the Force must maintain as a foundation for its processes and governance concerning the continuing promotion and embedding of integrity and the Code of Ethics. Detailed reporting will be by exception if any of the provisions change from their ‘green’ implemented status.

INDICATOR	Current position (Sep 2020)	Feb 20	Jun 20	Sep 20	Nov 20
<b>1.1</b> Force has issued a statement committing to support and embed the Police Code of Ethics	Included in all major force publications – Policing Plan, Corporate Plan and Annual Report	GREEN	GREEN	GREEN	GREEN
<b>1.2</b> Maintain a Force Integrity Delivery Plan	Plan in existence since Nov 2016, updated quarterly	GREEN	GREEN	GREEN	GREEN
<b>1.3</b> Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	The Integrity Standards Board is established, chaired by a chief officer, attended by all directorates and representatives from the Town Clerk’s Department and Police Authority Board. <b>There was no meeting during June/July, due to Covid restrictions.</b>	GREEN	AMBER	GREEN	GREEN
<b>1.4</b> Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	In existence and attend Integrity Standards Boards	GREEN	GREEN	GREEN	GREEN
<b>1.5</b> Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	In existence, last outcomes published 12 <sup>th</sup> December 2019 (none since that date)	GREEN	GREEN	GREEN	GREEN
<b>1.6</b> Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Process maintained, but no meetings organised during 2020 due to Covid restrictions, but Force is capable of participating when organised.	GREEN	GREEN	GREEN	GREEN
<b>1.7</b> Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	The Assistant Commissioner is the lead for integrity matters, chairing Integrity Standards Board, Organisational Learning Forum, Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. The Commander (Ops) additionally chairs London Police Challenge Forum panels for additional resilience	GREEN	GREEN	GREEN	GREEN
<b>1.8</b> Ensure training on standards, values, leadership and ethics is available for all staff and included in all mandatory training	Information on standards, values and leadership is available to all staff on the intranet. All mandatory training courses incorporate the Code of Ethics, which is also part of induction.	GREEN	GREEN	GREEN	GREEN



<b>1.9</b> To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force	GREEN	GREEN	GREEN	GREEN
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<b>1. Development Measures</b>	
<b>MEASURE</b>	<b>2.1 1</b> Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics
<b>OWNER</b>	Head of Strategic Development / Corporate Communication
<b>AIM/RATIONALE</b>	Focus groups conducted as part of the Integrity Peer Review highlighted the need for improved marketing and awareness raising of the Code of Ethics and work of the LPCF.
<b>MEASUREMENT</b>	Head of Strategic Development to provide ISB with details of activities supporting this indicator
<b>DUE BY</b>	December 2020
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Articles published Amber: Activity in train (within due time) but not delivered. Red: No activity and past due date
<b>TRAFFIC LIGHT</b>	<b>AMBER</b>
<b>CURRENT POSITION</b>	
Due to other priorities, this meeting is still to take place, however, a date has been set for 16 <sup>th</sup> December for a planning meeting.	

1. Development Measures	
<b>MEASURE</b>	<b>2.2</b> Work with the MPS Coordinator to revise the LPCF Terms of Reference
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	The Integrity Peer Review noted that the terms of reference of the LPCF had not been updated since the group's formation in 2016 and require amending.
<b>MEASUREMENT</b>	Revised Terms of Reference agreed by constituent organisations of the LPCF.
<b>DUE BY</b>	December 2020
<b>TRAFFIC LIGHT CRITERIA</b>	Green: TORs produced and agreed by due date; AMBER: work in train within the due date; RED: TORs not produced by due date
<b>TRAFFIC LIGHT</b>	<b>AMBER</b>
<b>CURRENT POSITION</b>	
<p>Head of Strategic Development has met with the MPS coordinator twice to discuss this issue and make changes to the partnerships terms of reference. Whilst changes have been made, they have not yet been consulted on with the other partnership forces (BTP &amp; National Police Counter Terrorism) and remain therefore unagreed. To meet the December deadline, attempts will be made to agree the ToR ahead of the next formal meeting, the date for which is still to be set.</p>	

## 2 Development Measures

<b>MEASURE</b>	<b>2.3 Conduct an annual review of the Force integrity programme and implement identified improvements</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
<b>MEASUREMENT</b>	Review completed and reported to ISB
<b>DUE BY</b>	September 2021
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
<b>TRAFFIC LIGHT</b>	<b>WHITE</b>
<b>CURRENT POSITION</b>	
The review will not take place until June/July 2021.	

2 Development Measures	
MEASURE	2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report
OWNER	Head of Strategic Development (and any other relevant individual identified by the report)
AIM/RATIONALE	To ensure the Force actions best practice identified by HMICFRS.
MEASUREMENT	Progress reported to Performance Management Group and ISB
DUE BY	March 2020
TRAFFIC LIGHT CRITERIA	Green: All AFIs delivered; Amber: Action in progress to deliver AFIs but not fully delivered; Red: AFI not delivered by due date
TRAFFIC LIGHT	RED
CURRENT POSITION	
<p>The Integrated PEEL report was published in early May. Whilst the Force was graded ‘Requires improvement’ for the Legitimacy aspect of the inspection, two of the areas identified for further improvement are relevant to integrity and the Code of Ethics:</p> <p><b>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</b></p> <p><b>AFI 9 – the Force should extend its unconscious bias training to all its officers</b></p> <p><b>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</b></p> <p><b>AFI 11 – The Force should ensure that its counter corruption unit (1) has enough capability and capacity to counter corruption effectively and proactively; (2) Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force’s data and indentify computer misuse; and (3) Builds effective relationships with individuals and organisations that support and work with vulnerable people.</b></p> <p><b>August 2019 update:</b> An action plan to address all the AFIs identified in the report has been drafted. A report has been submitted to the next Professional Standards and Integrity Committee (18<sup>th</sup> September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p> <p><b>February 2020 update:</b> AFIs 7 and 8 remain AMBER. Both areas were scrutinised by the PAB at its November meeting through the Use of Force (part of the Custody update) and stop and search update. A revised group now exists. Training of members of the group is ongoing, with a first meeting to assess data scheduled for March 11<sup>th</sup>. Following that meeting taking place, this should be GREEN.</p> <p>AFI 9 is GREEN – training commenced in November 2019, with completion being tracked by Learning and Development and reported to Performance Management Group.</p> <p>AFI 10 is AMBER – these documents were reviewed for 2018/19 but are now being re-evaluated for 2019/20. A Nactional Crime Agency updated threat assessment was received in December 2019, against which Force documents are being evaluated. It is anticipated this will be GREEN by the due date.</p>	

AFI 11 is AMBER – Although staff have been recruited there remains an issue connected to the monitoring of computer systems, which is being addressed but which is maintaining this indicator at AMBER.

**September 2020 Update**

**AFIs 7, 8, 9 and 10** are all now delivered and GREEN (reported to PAB in July 2020).

**November 2020 Update**

**AFI 12 is now RED** having missed the deadline to have the software in place by the end of September 2020. There are sensitivities relating to this software, therefore a fuller update can be provided by the Detective Superintendent PSD in the non-public section of your Committee.

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<b>Committee(s):</b>	<b>Date:</b>
Police Professional Standards and Integrity Committee	26 <sup>th</sup> November 2020
<b>Subject:</b> IOPC Review into Stop and Search, Report on the Metropolitan Police Service	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 82-20	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

On the 28<sup>th</sup> October 2020, the Independent Office for Police Complaints (IOPC) published the results of a review conducted in respect of the Metropolitan Police Service (MPS) relating to their use of stop and search. The review made 11 recommendations, all of which were accepted by the MPS.

Whilst not directly applicable to the City of London Police, the Force has nonetheless conducted its own assessment of its position against each of the recommendations, with the results of that assessment provided here for Members' information and assurance.

It is also worth noting that in an HMICFRS PEEL review completed in February 2020 where 252 Stop and Search conducted by City of London Police Officers were examined, HMICFRS found that 94% had grounds that were considered to be reasonable. This includes drugs searches as well as Section 1 PACE searches of the stops.

Members are asked to note the report.

## Main Report

### Current Position

1. The IOPC recently completed five investigations involving the stop and search of Black men by MPS officers and reviewed the collective evidence gathered to consider disproportionality, legitimacy and how force was used. The results of that review were published on the 28<sup>th</sup> October 2020, with the following principal finding:
  - (i) The legitimacy of stop and searches was being undermined by:
    - a lack of understanding about the impact of disproportionality;
    - poor communication;
    - consistent use of force over seeking cooperation;

- the failure to use body-worn video from the outset of contact; and
  - continuing to seek further evidence after the initial grounds for the stop and search were unfounded.
2. The IOPC noted that whilst stop and search is a necessary tool in policing, it has to be used with care and only in the right circumstances. Used incorrectly, it can harm community relations and public confidence in policing. The review also noted a disproportionate use of handcuffs when other de-escalation tactics could have been used, and an inconsistent use of body worn video.
  3. The IOPC liaised with a number of organisations, including “Y-Stop” and “Stopwatch”, a range of stop and search Scrutiny Panel Chairs (including the Pan-London Chair), and its own Youth Panel before making the learning recommendations detailed below.
  4. Eleven opportunities for the MPS to improve the way it exercises stop and search powers and consider disproportionality, have been recommended by the IOPC, they are:
    - (i) taking steps to ensure that their officers better understand how their use of stop and search powers impacts individuals from groups that are disproportionately affected by those powers
    - (ii) ensuring there is a structure in place so leaders and supervisors are proactively monitoring and supervising the use of stop and search powers and addressing any concerning trends or patterns/ sharing any identified good practice at; individual, unit or organisational level
    - (iii) taking steps to ensure that assumptions, stereotypes and bias (conscious or unconscious) are not informing or affecting officer’s decision making when carrying out stop and searches, especially when using these powers on people from Black communities
    - (iv) ensuring officers are not relying on the smell of cannabis alone when deciding to stop and search someone and use grounds based upon multiple objective factors
    - (v) ensuring officers carrying out stop and searches always use the principles of GOWISELY<sup>1</sup> and engage in respectful, meaningful conversations with the persons being stopped

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<sup>1</sup> To maximise the person’s understanding before starting the search, officers exercising stop and search powers must adopt the following steps in accordance with GOWISELY:

- identify themselves to the person
- show their warrant card if not in uniform
- identify their police station
- tell the person that they are being detained for the purpose of a search
- explain the grounds for the search (or authorisation in the case of section 60 searches)
- explain the object and purpose of the search
- state the legal power they are using
- inform the person that they are entitled to a copy of the search record and explain how this may be obtained.



- (vi) ensuring stop and search training incorporates a section on de-escalation, including the roles of supervisors and colleagues in controlling the situation and providing effective challenge
  - (vii) ensuring officers exercising stop and search powers are ending the encounters once their suspicion has been allayed, in a manner that minimises impact and dissatisfaction, unless there are further genuine and reasonable grounds for continued suspicion
  - (viii) ensuring officers exercising stop and search powers are not using restraint/handcuffs as a matter of routine and are only using these tools when reasonable, proportionate and necessary
  - (ix) amending stop and search records to include a question about whether any kind of force has been used. The records should also state where information about the kind of force will be recorded
  - (x) ensuring officers are following APP and MPS policy and switching on their body-worn video camera early enough to capture the entirety of a stop and search interaction
  - (xi) supervisors taking a proactive role in monitoring and ensuring compliance with body-worn video APP and MPS policy.
5. The MPS accepted all of the recommendations.
6. The Force has conducted its own review against the recommendations, the results of which are attached at Appendix 1.
7. It is also worth noting that in an HMICFRS PEEL review completed in February 2020 where 252 Stop and Search conducted by City of London Police Officers were examined, HMICFRS found that 94% of our records have grounds considered reasonable. This includes drugs searches as well as Section 1 PACE searches of the stops.

**Stuart Phoenix**  
Head of Strategic Development

T: 020 7601 2213

E: [Stuart.Phoenix@cityoflondon.pnn.police.uk](mailto:Stuart.Phoenix@cityoflondon.pnn.police.uk)



## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

### APPENDIX 1

City of London Police assessment against recommendations made by the IOPC's review into use of stop and search by the MPS.

Recommendation	Force position (please include any additional actions to be addressed (specify what they are and by when)
(i) take steps to ensure that officers better understand how their use of stop and search powers impacts individuals from groups that are disproportionately affected by those powers	<p>All front Line Officers have undertaken Stop and Search training and the impact it has on individuals from groups that are disproportionately affected by Stop and Search powers.</p> <p><b>Disproportionality and the City</b></p> <p>Due to the relatively small resident population compared to the large transient one in the City it is not easy to address questions of disproportionality. Traditionally this is calculated using the resident population of an area and the officer perceived ethnicity. In the current period however there were only five people stopped who gave their address as being within City grounds.</p> <p>Another option available is to use the workday population which includes all people who gave a fixed work place in the City and those residents who are at home during the day however given that 63% of stops occur outside of a typical working day (Monday-Friday 08:00-18:00) this is also unlikely to give an accurate representation of the available street population. Particularly during the current climate of coronavirus with many people working from home this is likely not to be relevant.</p> <p>When we look at the residential addresses of people stopped this quarter 64% live in the greater London area, 8% are of no fixed abode, 21% are from other areas and 7% did not give their address.</p> <p>Based on this disproportionality has been calculated using the residential population figures for the whole London region. In terms of population data the most recent finalised census data is from 2011 so that has been used here. The most recent midyear estimates for 2018 were also checked but did not offer much difference in terms of results. Levels of disproportionality have decreased slightly across this quarter from 1.9 to 1.6 for Black individuals and from 1.3 to 1.2 for Asian individuals, the level for other ethnicities has remained the same. The group most commonly stopped and searched in terms of perceived and self-defined ethnicity is white individuals. Most people stopped are between the ages of 18 and 24 years old.</p>

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<p>(ii) ensure there is a structure in place so leaders and supervisors are proactively monitoring and supervising the use of stop and search powers and addressing any concerning trends or patterns/ sharing any identified good practice at; individual, unit or organisational level</p>	<p>Stop and Search undertaken by officers in the City of London Police are proactively monitored and supervised by front Line supervisors. Stop and Search reports are also dipped sampled by the Force Lead on Stop and Search to monitor and address any concerns or patterns as well as good practice. Reports and findings are presented in dashboards every Quarter and this data is examined and discussed with the City of London Police Stop and Search Monitoring Group and scrutinised by members of the Independent Advisory Community Scrutiny Group. Issues and actions identified are recorded and presented back to the City of London Police Stop and Search Chair (Superintendent) and the Stop and Search Force Lead Inspector.</p>
<p>(iii) take steps to ensure that assumptions, stereotypes and bias (conscious or unconscious) are not informing or affecting officer's decision making when carrying out stop and searches, especially when using these powers on people from Black communities</p>	<p>All stop and searches are supervised and scrutinised by front Line supervisors. By examining the grounds recorded Supervisors are able to identify assumptions, stereotypes and bias that might influence the searching officer. Any issues identified are discussed with the officer by their Supervisors and if a training issue is identified Force Stop and Search Lead and Learning and Development are approached. All front line officers in the City of London police have had training in the last 2 years re conscious and unconscious bias. The City of London police will be introducing further training re Stop and Search and the impact these powers have on people from the black community within the next 12-18 months.</p>
<p>(iv) ensure officers are not relying on the smell of cannabis alone when deciding to stop and search someone and use grounds based upon multiple objective factors</p>	<p>All front line officers have had training and guidance around the use of relying on the smell of cannabis alone to search for drugs. The smell of cannabis is contentious issue as there are a number of Chief officers in the country who state that these are grounds to search for cannabis. Reasonable grounds states "Unless exercising a specific 'no suspicion' stop and search power – the circumstances of which are strictly limited – the officer must have reasonable grounds for suspicion before they stop and search someone. This means that: the officer must <b>genuinely suspect</b> that they will find the item searched for and it must be <b>objectively reasonable</b> for them to suspect this, given the information available to them. This is an objective test in that it expects that a reasonable person given the same information would also suspect that the individual is carrying the item. The suspicion should relate to the likelihood of the person being in possession of the item, not the likelihood that they are committing an offence.</p> <p>Although the College of Policing advises officers against carrying out a stop and search, based solely on the smell of cannabis and a recent report by HM Inspectorate of Constabulary (HMICFRS) found that the smell of cannabis should not be grounds to stop a suspect in and of itself. This is only guidance for officers and not</p>

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	<p>law. Reasonable grounds for suspicion must relate to the likelihood that the object in question will be found. There is no stated case which says that the smell of cannabis alone cannot provide reasonable grounds. However based on HMICFRS report searching Officers should consider and record all of the information available to them, including their own observations of suspicious behaviour, not just the smell of what they believe to be cannabis. Enough information to make it possible for someone else to judge if a reasonable person would also have suspected the individual of carrying the item.</p> <p>HMICFRS PEEL review in February 2020 examined 252 Stop and Search conducted by City of London Police Officers re the strength of the grounds recorded. HMICFRS found 16 reports that were considered insufficient grounds to search. The net effect is that 94% of our records have grounds considered reasonable. This includes drugs searches as well as Section 1 PACE searches.</p> <p>For the reporting year 2019/2020 City of London Police Officers conducted 3001 Stop/Searches. As a result 946 subjects were arrested (arrest rate of 31.5%) one of the highest if not the highest of all of the 43 territorial police forces in England and Wales and a Positive Outcome of 40.5% which refers to any case where action is taken against people who've been stopped and searched. This includes arrest cases but also covers other resolutions like warnings and Penalty Notices.</p>
(v) ensure officers carrying out stop and searches always use the principles of GOWISELY <sup>1</sup> and engage in respectful,	Front Line supervisors are instructed to dip sample Body Worn Video to make sure that the principles of GOWISELY are being conducted and that officers are respectful with the person being searched. The Forces Stop and Search monitoring Group are continuously promoting this message to front Line Supervisors. For further scrutiny a paper is being written re Data Protection Impact Assessment (DPIA) so that members of

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<sup>1</sup> To maximise the person's understanding before starting the search, officers exercising stop and search powers must adopt the following steps in accordance with GOWISELY:

- identify themselves to the person
- show their warrant card if not in uniform
- identify their police station
- tell the person that they are being detained for the purpose of a search
- explain the grounds for the search (or authorisation in the case of section 60 searches)
- explain the object and purpose of the search
- state the legal power they are using
- inform the person that they are entitled to a copy of the search record and explain how this may be obtained.

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meaningful conversations with the persons being stopped	the IASG can view the Body worn footage. As a result members will be able to examine and analyse the encounter and advise accordingly. Training is being undertaken with the IASG by the Equality and Inclusion manager, and the Inspector Stop and Search Force Lead.
(vi) ensure stop and search training incorporates a section on de-escalation, including the roles of supervisors and colleagues in controlling the situation and providing effective challenge	Stop and Search training and Officer Safety training incorporates de-escalation training to avoid an encounter becoming challenging and difficult. Supervisors understand their roles when present during a stop and search encounter with a member of the public or when viewing Body Worn Video to defuse the situation, control the situation and advise colleagues appropriately providing constructive feedback. Good and bad practices are highlighted and submitted to the Stop and Search monitoring Group, Learning and Development and Professional Standards department.
(vii) ensure officers exercising stop and search powers are ending the encounters once their suspicion has been allayed, in a manner that minimises impact and dissatisfaction, unless there are further genuine and reasonable grounds for continued suspicion	Supervision is undertaken by front line Supervisors to ensure good practice and identify bad practice. Complaints that are brought to the attention of the Force re Stop and Search are investigated by the City of London Professional Standards Department. The City of London Police signed up to the Best use of Stop and Search Scheme in April 2014. Forces participating in the Scheme had to identify complaint triggers to signpost the appropriate mechanism for members of the community to raise any concerns or complaints that they have with the way that a stop and search has been carried out by their police force. Forces participating in the Scheme have local discretion to determine the most appropriate way to establish the community complaints trigger. Every complaint recorded re Stop and Search is identified as a trigger complaint and investigated as part of the Best use of Stop and Search Scheme.
(viii) ensure officers exercising stop and search powers are not using restraint/handcuffs as a matter of routine and are only using these tools when reasonable, proportionate and necessary	Officers conducting stop and search powers do not routinely handcuff or restrain persons being searched unless it is proportionate, legal, necessary and the officer can account for his/her actions for doing so. Officer Safety Training incorporates handcuffing and retraining methods but this is in line with the National Decision Model NDM. Data relating to Use of Force is recorded and presented to the Stop and Search Monitoring Group which also oversees and has responsibility for scrutiny. The Data is presented to the IASG and published on the forces external website along with stop and search data for the public to view and examine.

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(ix) amend stop and search records to include a question about whether any kind of force has been used. The records should also state where information about the kind of force will be recorded	Action is being undertaken by the Stop and Search monitoring Group and Frontline Digital Mobility. Stop Search records to be amended on IT systems to incorporate this information. All Use of Force recorded is presented on a Dashboard and can be accessed via the City of London Police Force external Website for scrutiny. No issues have been identified around the use of handcuffing and restraining subjects during Stop and Search however this is continuously monitored.
(x) ensure officers are following APP and MPS policy and switching on their body-worn video camera early enough to capture the entirety of a stop and search interaction	Officers have been instructed to switch on their Body Worn Video prior to the commencement of the encounter in line with the College of Policing APP. City of London Stop and Search/ Body worn Policy. Continuous messaging relayed to all front line officers by Senior Leadership Team, Front Line Inspectors and Front Line Sergeants
(xi) supervisors take a proactive role in monitoring and ensuring compliance with body-worn video APP and MPS policy.	Front line Supervisors have been instructed to take a proactive and intrusive stance re monitoring and viewing Body Worn Video and record their supervision on NICHE. Ongoing monitoring being undertaken by Stop and Search monitoring Group. (Dip Sampling). Further training and messaging to be undertaken.

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## **GLA Press Release 13/11/20: Stop and search to be better scrutinised**

### **Mayor's Action Plan focuses on disproportionality of police powers**

13 November 2020

- Sadiq to overhaul community scrutiny of police tactics including stop and search, use of force and Taser
- Commissioner says the Met is not free of racism or discrimination, but is listening and wants to work with Black communities to accelerate change.
- City Hall to invest £1.7m on community involvement in police officer training and on recruitment of Black officers in the Met

The Mayor of London, Sadiq Khan, has today published an Action Plan to improve trust and confidence in the Metropolitan police and to address community concerns about the disproportionality in the use of certain police powers affecting Black Londoners.

The Action Plan has been developed following a series of consultations with more than 400 individuals and groups that either work with or within Black communities. The work was undertaken in response to concerns raised about the disproportionate use of police powers, including stop and search, the use of force and Taser. Communities told the Met and City Hall that they wanted to see increased transparency in police actions, decisions and communications; a police service that better reflects the city it serves; and improved community monitoring and involvement in reviewing the disproportionate use of police powers and complaints.

The Mayor recognises the progress made by the Met since the Macpherson Inquiry more than 20 years ago. It is more transparent and more accountable than at any time in its history and is more representative of London with more than 5,000 Black, Asian and Minority Ethnic officers, up from just over 3,000 a decade ago.

But it is clear more needs to be done. City Hall figures show Black Londoners have less confidence and less trust in the Met than white Londoners and that there remains a persistent disproportionality in the way certain police powers affect Black Londoners. <sup>1</sup>

Figures published today show Black Londoners are almost four times more likely to be stopped and searched on the street than white people in London and six times more likely to be stopped in their vehicles.

The Mayor wants all communities across London to feel they are able to trust their police service and have confidence that the police use their powers to keep them safe. It's crucial that the police are trusted to be able to use their powers to bear down on the scourge of violent crime in our city – which has a devastating effect on families and communities, and which the Mayor and the Met police Commissioner, Cressida Dick, have made it their top priority to tackle.

The launch of the Action Plan comes as the Commissioner, Cressida Dick, today issued a statement in which she recognises and regrets the pain and anguish felt by London's Black communities and says the Met police is not free of racism, bias or discrimination.

She will make it clear that the Met is listening and wants to work with Black communities to accelerate change. The Commissioner will say the police are making progress and have already transformed training and education on diversity and inclusion, and the Met is building on its growing number of BAME officers.

From City Hall, the Mayor commits, as part of the action plan, to invest £1.7 million to develop greater community involvement in police officer training and in the recruitment and progression of Black officers in the Met.

The Action Plan – which the Met Police welcomes and has committed to take forward actions specific to the police service - focuses on:

An overhaul of community monitoring structures to ensure that London's diverse communities are better represented – Black communities will have an even greater role in monitoring a wider range of police powers, including stop and search, the use of Tasers and complaints. There will be greater community involvement in scrutiny of the Met – particularly including the Territorial Support Group and Violent Crime Taskforce. The Mayor's Office for Policing and Crime (MOPAC) will produce a quarterly race equality audit of the Met's use of its powers and launch a three-month project with communities to co-design and launch this new scrutiny process.

Stricter oversight and scrutiny of the 'smell of cannabis' used as sole grounds for stop and search – Stop and searches with grounds solely based on the smell of cannabis will be subjected to London-wide scrutiny panels and body worn video footage is being made available to communities for further scrutiny to ensure officers are not relying on the smell of cannabis alone when deciding to stop and search, and use grounds based on multiple objective factors.<sup>2</sup>

Research into stop and search using Body Worn Video (BWV) footage – Academic research to be undertaken of a sample of body worn video footage to understand better the nature of stop and search interactions and the behaviour factors of officers or individuals that lead to escalation in the use of force.

Public scrutiny - The Mayor and Deputy Mayor for Policing and Crime, together with a panel of community members, will scrutinise the work of the Met. Londoners could also submit questions to be answered by the Met Commissioner and senior officers.

Pilot project to review vehicle stops and call for mandatory data collection – The Mayor has asked the Met to launch a new year-long pilot project to review samples of vehicle stops to identify any disproportionality relating to ethnicity. The Mayor has also written to the Prime Minister to request it be made statutory for the police to collect and publish data on ethnicity for all road traffic stops as part of the Home Office Annual Data Requirement. The letters also asks that the Codes of Practice supporting the Police And Criminal Evidence (PACE) Act – under which street searches are carried out – be extended to cover road traffic stops to more clearly define the limits of the powers.

#### **Improvements to training and diversity in the Met include:**

Developing community-led training for police officers – The Met has committed to increase community input by default into specific aspects of the training given to new recruits. This will be made possible by City Hall investment of £1m per year.

Challenging aims for Black police officer recruitment - The Met want to see as many as 40 per cent of new recruits from Black, Asian and Minority Ethnic backgrounds from 2022. The Commissioner has also decided the Met will immediately re-introduce the London residency criteria for most new recruits and will be supported by £300,000 of City Hall investment to encourage young Black Londoners to consider a career in policing.

Delivery of the Action Plan starts immediately and City Hall will involve communities in regular meetings to review the progress made towards the Action Plan's objectives, the first of which will be in February 2021.

**The Mayor of London, Sadiq Khan**, said: "In London, we pride ourselves on being a beacon of diversity and a city that is both fair and inclusive, but the Black Lives Matter protests in the summer, which followed the tragic killing of George Floyd, highlighted how much more we have to do to improve trust and confidence among the Black community in our public institutions.

"Through the development of this Action Plan, we've listened and responded to the continued frustrations of Black Londoners, who are concerned about the disproportionate use of some police powers. It's simply not right that Black Londoners have less trust and confidence in our police service and it's something I am determined to resolve.

"The Stephen Lawrence report was a landmark moment in the history of race relations in our country. It had a transformative effect on policing and it's clear the Met is a very different police service to the one it was 20 years ago. There is no question that our police officers work extremely hard to keep us safe and the Met has made improvements to become a police service more reflective of the city it serves. But more must be done – and will be done through this Action Plan – properly to recognise and address the impact that some police tactics used disproportionately on Black people is having.

"This starts with involving communities and ensuring they have proper oversight and scrutiny of stop and search, the use of Tasers and the use of force, as well as in the training of new police officers so they can better understand the trauma that the disproportionate use of police powers can have on Black Londoners.

"We need all communities in London to have trust in the use of police powers as the Met goes about the vital work of tackling crime. As a result, the whole city will be a safer place for all Londoners."

**Lord Simon Woolley, director and founder of Operation Black Vote**, said: "The Action Plan is an important and much welcomed step towards improving trust and confidence in policing in London.

"Black communities need to see a police service that truly represents society and is actively anti-racist. I have been a longstanding supporter of improving diversity in the police, but also ensuring that our law enforcement officers police with consent. Therefore, I welcome the Mayor's investment in all of these key areas.

"It's clear that there is a long way to go to improve trust and confidence in the Met, and I want to believe that Black communities have been listened to and been involved in new measures that we all hope will bring about much needed change. I remain optimistic and hopeful."

**Pastor Lorraine Jones, founder of Dwaynatics**, said: "I have been working on the frontline to tackle knife crime in London and I am concerned by the scale of the violence in this city. I have also had first-hand experience of stop and search and know the trauma this causes when done badly and aware of the negative impact this has on our community trusting and working with the police. It's so important that the Met has a culture of treating Black Londoners with respect and kindness so they feel safe and protected. I am pleased this is finally being recognised with this important work.

"I am very pleased with the Mayor's Action Plan. It is clear he has listened to the concerns of the community and highlighted really important areas that the police need to work closely with London's Black community on. We have something on paper that we can use to hold the police to account and it shows a timely and real shift in the Met's approach, which we have all really needed to see.

"It gives me more confidence and a peace for my children and grandchildren to know these changes are going to be made. What the community really needs to see is action and I look forward to seeing the police follow this new framework to strive to be a police service that protects all of us.'

**Janet Hills, Chair of the Met's Black Police Association** said: "We welcome the Mayor's Action Plan which was sent out for London wide consultation, allowing for open and candid discussions with the Black communities.

"It is encouraging to see that the Met have agreed to make significant changes as a result, particularly around the recruitment of Black police officers and those that define themselves as Black, to ensure greater representation of police officers and staff at all ranks.

"Black Londoners should view the police service as an employer of choice, and have confidence in them to deliver a fair and equitable service. We will continue to do everything we can to improve the working environment of Black police officers and staff within the MPS. The Action Plan is a start to building the trust that is needed to ensure that we have a police service that is diverse and inclusive to all."

**Sayce Holmes-Lewis, CEO of Mentivity**, said: "Firstly, I'd like to thank the Mayor of London, Sadiq Khan, the Deputy Mayor of Policing, Sophie Linden, and the large number of Londoners that have showcased their commitment and contributed to this Action Plan to improve the transparency, accountability and trust in policing within London.

"I truly believe that this Action Plan is the basis and the foundation for real, progressive change, especially in relation to how Black people are to be policed within the capital. However, I am under no illusions that we still have much to do and the real work commences now. Actions speak louder than words. We must move forward constructively as a cohesive, collective and committed community to make these recommendations and changes a reality so that the Metropolitan Police Service improves its service to all Londoners, but especially the Black, African and Caribbean communities that have been over-policed and under-protected for so long.

"We have an opportunity to make a true difference and enact a legacy of sustained change. Let's keep the momentum going."

**Ben Lindsay, CEO and founder of Power The Fight**, said: "While the acknowledgement that historic and systemic racism has created a breakdown in trust between the police and black Londoners is welcome - there is still much to be done.

"This detailed action plan is a good start in supporting the voices of Black Londoners and Black police officers to be heard, holding the police to account for their actions, encouraging the police to adapt their methods and providing solutions for greater community cohesion in relation to policing in London."

- Ends –

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**ACTION PLAN:**  
TRANSPARENCY,  
ACCOUNTABILITY AND  
TRUST IN POLICING

Working together to  
provide a police service that  
has the confidence of  
all Black Londoners

The Mayor of London sets the budget and is responsible for making London a better place for everyone who visits, lives or works in the city. The Mayor is elected every four years and sets out an overall vision for London. He has a duty to create plans and policies for the capital covering: Arts & Culture; Business & Economy; Environment; Fire; Health; Housing and Land; Planning; Policing & Crime; Regeneration; Sport; Transport; and Young People. Other priorities for the Mayor include higher education, foreign investment and attracting events to London.

A key part of the Mayor's role is setting the strategic priorities and budget for the Metropolitan Police Service (MPS), and for overseeing the Commissioner's work in delivering an efficient and effective service for Londoners. The Mayor sets out those priorities in a Police and Crime Plan, published in the first year of each Mayoral term. The Mayor is not responsible for operational decisions by the police – that is the job of the Metropolitan Police Commissioner.

This Action Plan is part of the long-running programme of work led by the Mayor to tackle racial inequalities in London. Central to this is the Mayor's Equality, Diversity and Inclusion Strategy, 'Inclusive London', which sets out key inequalities affecting the lives of Londoners. This Strategy drives work on equality and inclusion, including race equality, with a range of projects, programmes and policies spanning education, health, civil society, as well as policing. Community engagement and advisory functions provide expertise on race equality to bring insight and shape to GLA work. These include the Mayor's Equality, Diversity and Inclusion Advisory Group, the Migrant and Refugee Advisory Panel and civil society partner organisations.

The GLA seeks to lead by example by taking a mainstreaming approach that embeds equalities work across departments and acting as an inclusive employer and responsible procurer. As an open and engaged organisation its campaigns, events and communications are aimed at being as inclusive as possible, celebrating London's rich diversity and building stronger relationships with and between communities across London. More recently, the Mayor has further committed that the GLA and GLA Group strive to take an anti-racist approach across all work – so that there is greater focus on racial inequalities and the actions that are required to bring about change. This builds on efforts to tackle inequality but recognises that, for many Black Londoners, as well as other minority ethnic groups of Londoners, things are not changing quickly enough.



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# Actions

## BETTER USE OF POLICE POWERS

- The Mayor has asked the MPS to launch a new pilot project to review samples of vehicle stops conducted under Section 163 of the Road Traffic Act to identify any disproportionality relating to ethnicity. This pilot will be informed by the learning from previous studies into this issue and will enable a better understanding of how these powers are being used, and if they are being used disproportionately, to identify appropriate actions to tackle this.
- The Mayor has written to the Prime Minister to ask him to use national Government powers to compel police services to collect and publish data on ethnicity of vehicle drivers stopped under the Road Traffic Act, as part of the Home Office Annual Data Requirement. In addition, the Mayor has asked that the Codes of Practice supporting the PACE Act be extended to cover road traffic stops to more clearly define the limits of the powers.
- The Mayor has welcomed the Commissioner's review of the use of handcuffing in the MPS. Maintaining a clear focus on officers' safety as well as that of members of the public, the review is considering:
  - the legal and policy basis for pre-arrest handcuffing;
  - the training officers receive in how and when to use handcuffs;
  - improving the data on the extent of handcuff use;

- accountability and recording of the use of handcuffs; and
- looking for digital solutions for improving the accountability, supervision and transparency of handcuffing.

A number of community representatives are involved in the working group for the review, alongside a representative of the Metropolitan Police Black Police Association. This review will be brought forward quickly, with an update published before the end of 2020.

- MOPAC will scrutinise the MPS to ensure that Authorised Professional Practice is followed around searches based on multiple objective factors, and that officers ensure that where searches are based only on the smell of cannabis that their grounds and rationale are clear and fully documented.
- MOPAC will commission independent academic research, using open-source data, to assess the effectiveness of cannabis enforcement in relation to tackling violence in London. This research will begin before the end of 2020.
- The MPS in Haringey are working with Haringey Council safeguarding leads to review the safeguarding response to under-18s who are repeatedly stopped and searched. This work will identify how best to ensure that contextual safeguarding is at the centre of those interactions and where there are wider concerns these young people can benefit from timely support and interventions.

## WORKING TOGETHER TO MAKE BLACK COMMUNITIES SAFER

- The MPS will continue to ensure that the work of the Safer Schools Officers is monitored and assessed to ensure the positive work they do can continue and that there are no disproportionate impacts for Black children.
- MOPAC will regularly consult parents in London about their views on Safer Schools Officers via its Public Attitudes Survey. MOPAC will analyse the findings by ethnicity, to help identify differences in perceptions between different communities and to inform action to address any disproportionality.
- MOPAC will continue to incorporate questions about Safer Schools Officers in its regular Youth Voice survey of children and young people in London. Run every three years and reaching more than 7,000 young Londoners, the survey provides a detailed snapshot of how young people in London feel about policing, crime and safety in their city.
- MOPAC will launch a review of MARACs in London by the end of 2020. This will establish the facts around attendance at MARACs and consider whether and how concerns about immigration status and perceptions of policing deter women from reporting crimes committed against them, even when their life is in danger.
- London's Independent Victims' Commissioner, Claire Waxman, will launch a new consultation with Black women and the End Violence Against Women (EVAW) coalition to understand their specific needs and experiences. Out of this, any recommendations directed at the wider criminal justice organisations in London will be pursued. This work will begin in November 2020 and will report in early 2021.
- MOPAC and the MPS have committed to work with communities to review all of their existing community engagement mechanisms, to make them more transparent and to identify accessible opportunities for Black communities to be engaged. Work on this review will begin immediately.
- The MPS is working to develop a 'Handbook of Engagement' which will be shared with communities, enabling better joint-working to identify further opportunities for how the Service can listen and serve its communities, and in particular Black and ethnic minority communities.

## A POLICE SERVICE THAT BETTER REPRESENTS AND UNDERSTANDS BLACK COMMUNITIES

- Building on significant improvements over many years, the MPS is aiming for 16% of its officers to be BAME by 2022, 21% by 2024 and 28% by 2030. To support this new, challenging aim for the diversity of the MPS, new aims on recruitment of officers have been agreed. The MPS want to see as many as 40% of new recruits from BAME communities from 22/23.
- The MPS will set specific aims for the recruitment and promotion of Black officers.
- The MPS will imminently re-introduce the London residency criteria for most new recruits. This will help contribute towards recruits having the skills and knowledge to police our diverse global city. This will be supported by targeted investment of £300,000 for new outreach work on recruitment to encourage young Black Londoners to consider a career in policing.
- The Mayor will lobby the Government to review the legislative framework for police officer recruitment to ensure it is fit for purpose and supports efforts to maximise the number of Black recruits.
- The MPS will ensure communities are more closely involved in the design of new police learning and development by default and a new Learning and Development Community Reference Group will be established to facilitate this.
- In support of broadening the conversations with communities on the use of stop and search, the MPS will mobilise a local pilot in the Central South BCU (Lambeth and Southwark). Over a six-month period, this will bring together a mix of 500 front line operational officers (new recruits and established officers) within community led workshops on cultural equality with the aim of developing a deeper understanding of real-life experiences of stop and search and its impact on both individuals' and the wider communities' trust and confidence in the MPS.
- The MPS will incorporate direct community input into specific aspects of the training given to new recruits across the service. This community-led training will centre on the following areas and be made possible by an additional investment of c£1m per year for three years.
  - **Local Community Familiarisation** – new recruits will spend a proportion of their initial learning understanding the history of the local area they will police, including learning the cultural history, lived experiences and the challenges the communities have faced. This will be supplemented by a bespoke local Community Immersion Project.
  - **Refreshed Safety Training** – the officer safety training that new recruits receive will be enhanced with a planned extra three days centred on how the MPS equip recruits with additional skills

to deal with and de-escalate potential conflict situations to improve safety for the public and for those on the frontline.

■ **Refreshed Stop and Search Training**

– during their initial learning new recruits will spend time understanding the importance of cultural awareness and the impact of issues such as unconscious bias and disproportionality on communities across London, specifically Black communities. This includes scenario-based role plays such as ‘trading places’ exercises, where officers will be put in the shoes of the people they stop.

- The MPS has committed to continue involving communities in the design of refreshed safety training, undertaken annually by all officers, including strengthened procedural justice learning outcomes. Work to engage external community stakeholders within the design process will take place between October 2020 and March 2021, with a wider roll-out planned from April 2021.
- The MPS has commissioned Middlesex University to develop a cultural awareness toolkit and a two-part training video, which will include an explanation and demonstration of the principles behind procedural justice – giving people assurance that they are being treated in a fair and just way by authorities – a vital concept for the legitimacy of policing. Once completed the toolkit will be made available to officers and staff through the MPS intranet.
- The MPS will set challenging aims to increase the number of Sergeants and Inspectors from BAME groups and will set a specific aim for Black officers. This will be supported by MOPAC committing £400,000 per annum, ring-fenced additional funding to the MPS from City Hall over and above core police funding, to build on the positive progress already made by the MPS in eradicating disproportionality within its Promotions Framework. The MPS will publish details of this scheme at the end of January 2021, following consultation with staff associations.
- The Mayor has welcomed the MPS’ commitment to continue to significantly reduce disproportionality within the grievance and misconduct processes by 2024. The MPS has put in place a checks and balances process to review internal referrals into the misconduct process, to ensure opportunities for learning have been fully explored. The Mayor will hold the Commissioner to account for ensuring that this happens.
- The MPS is expanding the support provided via Operation Hampshire to support officers and staff who are victims of all hate crime while on duty. This is to ensure that every officer or member of staff who is assaulted, or subjected to a hate crime or both, is treated as a victim and that they have meaningful support.

## HOLDING THE POLICE TO ACCOUNT FOR WHAT THEY DO

- MOPAC will create a new group to actively involve communities in its scrutiny of the MPS' citywide activities and pan-London teams such as the TSG, RTPC and the VCTF, and in the way that complaints about the use of intrusive tactics are handled. In November 2020 MOPAC will start a new, three-month project with communities to co-design and launch a new Disproportionality Scrutiny Group, to increase confidence that these powers are being used fairly and proportionately.
- MOPAC will produce a quarterly race equality audit, reporting on the MPS' use of its powers, including for example, the use of Tasers and strip-searching, publishing this data and holding the Commissioner to account for it. MOPAC will consult communities on what information they would like to see and on how to ensure it is accessible and easy to use. The first of these audits will be published in the first quarter of 2021.
- MOPAC will overhaul its community monitoring structures to ensure that London's diverse communities are better represented, can have a role in monitoring a wider range of police powers, including stop and search and the use of Tasers, and complaints. MOPAC will work with communities to ensure that the new arrangements reflect what local people think is needed in their area, with proposals brought forward by February 2021.
- The MPS has put in place the necessary safeguards and has reinstated Body Worn Video reviews by Community Monitoring Groups from October 2020. MOPAC will also lobby the Home Office to revise the current Code of Practice to make the review of BWV footage a mandatory requirement for community scrutiny.
- MOPAC and the MPS will start work shortly to jointly research a sample of Body Worn Video footage, to:
  - examine the nature of stop and search interactions, particularly when there is escalation or de-escalation in the behaviour of officers or the individual(s) being stopped; and
  - understand how different groups of people experience and interpret stop and search interactions.
- MOPAC will further expand the role of Independent Custody Visitors in London through a new process enabling ICVs to look through complete custody records. These records detail the detainee's full journey through custody, helping to reveal issues and challenges that previously were not identified. This pilot will begin in January 2021
- MOPAC will review and refresh its Justice Matters and Policing Matters meetings, at which the Commissioner and members of her senior team will answer questions on the work of the MPS. These quarterly meetings will be open to the public through online broadcast and, when the Covid-19 situation allows, in-person.

- MOPAC will set up a group including communities and partner organisations to develop a communications plan to ensure that information about people's rights when stopped and searched - and about how to complain - is more widely available, including via digital channels. In addition, MOPAC will work with the IOPC to publicise information on the complaints process more widely and support local initiatives that seek to assist communities in exercising their right to complain.
- MOPAC and the MPS will run a new Complainants Survey asking about people's experiences of the complaints process. This will enable a better understanding of how the journey can be improved. This is important not only for those that have taken the steps to share their thoughts, but also for some individuals that feel there are barriers to doing so. MOPAC will include a question speaking to this in the Public Attitudes Survey and take forward the learning from these surveys to ensure that the complaints process is more accessible.
- Anyone who is stopped and searched is entitled to a record of the incident. In London, these are currently only available by visiting a police station. It is vital that it is as easy as possible for people to access this information and the MPS is working with other forces to find a comprehensive solution. In the interim, the Mayor has asked the MPS to make stop and search records available by email to anyone who would wish to receive the information in that way.
- MOPAC will continue to publish updates on progress against the Gangs Violence Matrix Review to ensure that there is continued transparency and scrutiny around the way it is used and managed, the proportionality of the Matrix population and the Equality Impact Assessments of the Gangs Violence Matrix.
- MOPAC, the MPS and the GLA will review how data sharing between organisations is working and make recommendations on how more data can be made accessible, in line with work with other London public services. In addition, the MPS will sign up to the Voluntary Code of Practice for Statistics in line with MOPAC and the GLA, ensuring that data is used to a consistent and high standard by all parties.



## Next steps

- The London Policing Ethics Panel has also reflected on the issues raised by the Black Lives Matter movement, particularly in the context of the continuing challenges of policing public health during the coronavirus pandemic and is to publish two papers addressing the issues of moral repair and ethical community engagement. The MPS and MOPAC will use these reflections to support and inform their response as the Action Plan is delivered.
- To maintain transparency and accountability, the delivery of the Plan will be overseen by a Board co-chaired by the Deputy Mayor for Policing and Crime alongside an independent co-chair, bringing in community voices and expertise.
- MOPAC will ensure this Plan is subject to an Equality Impact Assessment to document how any differential impact on Black communities has been considered and mitigated.
- MOPAC will involve communities in regular meetings reviewing the progress made towards the Action Plan's objectives, what work is underway, what has been completed, identifying barriers to further progress and considering any additional steps required. The first of these meetings will take place in February 2021, with further meetings in July 2021 and December 2021.
- To ensure that there is transparency in the delivery of the Actions in this Plan, MOPAC will publish on its website a quarterly update, listing all of the Actions and what has happened over the period towards delivering them.
- Following the Mayoral election in May 2021, a new Police and Crime Plan – the statutory document in which the Mayor sets the priorities for the Metropolitan Police Service – will be produced and published. MOPAC will conduct specific consultation with Black Londoners to ensure that their views are reflected across all of the Mayor's priorities for policing, crime and justice in London.



## Foreword: Sadiq Khan, Mayor of London



From the shocking killing of George Floyd by police officers in Minnesota to the disproportionate impact of the Covid-19 pandemic, 2020 has demonstrated the devastating human consequences of systemic racism in the starkest terms. I not only recognise the serious and lasting impact that entrenched racism has had on our society, but I have felt it personally as a Londoner from a minority ethnic background, who has spent my entire life living, working and raising a family in this city.

There is no question that the London of today is a very different, better, fairer place to the city I grew up in. This is thanks to the efforts and sacrifices of generations of Black, Asian and Minority Ethnic (BAME) campaigners and white allies who have helped to call out and tackle racism - both overt and hidden. But there is still a great amount of work to do to unpick the conscious and unconscious bias and systemic racism that still exists in our public institutions and our society as a whole. It is essential that we listen and respond to the frustrations voiced by Black communities - highlighted by the protests this summer - about the racial and social injustice they see when they interact with our public institutions - from the police service to the education system, the courts, the media and beyond.

As Mayor, I'm determined to do everything I can to accelerate our progress towards creating a fairer, more equal city. And I'm committed to leading by example by making City Hall an actively anti-racist organisation. This includes launching an organisational-wide cultural change programme, underpinned by an independent review into the structural barriers that prevent BAME progression, and specifically the progression of Black Londoners. Through this Action Plan, I'm also taking immediate and specific steps to address the lower levels of trust and confidence that Black Londoners have in the Metropolitan Police Service (MPS), which I oversee as Mayor on behalf of Londoners.

There is no doubt that the MPS has made significant and positive steps forward since the 1999 Macpherson Inquiry into the racist murder of Stephen Lawrence and the subsequent failings in the police investigation, which concluded that institutional racism existed in the MPS and in other police services countrywide. A recurring and understandable question throughout our consultation for this Action Plan was whether institutional racism continues to exist in the MPS. This remains a deeply contentious point, with passionate arguments on both sides. Either way, the fact that this question is still being asked demonstrates how much more work needs to be done to ensure that the MPS has the trust and confidence of all Black Londoners. There are no easy answers, and the process of producing this Action Plan has been uncomfortable and challenging for everyone involved. But it was absolutely the right thing to do to ensure that we can now make the progress we all want to see.

Today the MPS is a more representative, more transparent and more accountable organisation than at any time in its history. This is a credit to the men and women of the MPS, who do a remarkable job for our city, working around the clock in some of the most difficult and dangerous circumstances imaginable to keep us safe. It's crucial that the police have the confidence to be able to use their powers to bear down on the scourge of violent crime in our city – which has a devastating effect on families and communities.

But it's clear that more work is needed to realise our ambition to have truly representative police service that has the trust and confidence of all Londoners. Over the last few months, my team and I have been listening to the experiences and concerns of Black Londoners. There are clearly widespread feelings of anger and mistrust around disproportionality in the use of some police powers affecting Black Londoners, about the lower level of confidence that many Black Londoners have in the MPS, and about how the MPS does not fully represent or understand Black communities in London.

I welcome the MPS' engagement in these conversations and in the development of this Action Plan, which includes many great new initiatives, such as involving communities by default in police training and setting specific recruitment aims for Black police officers. In working together to deliver this plan, we can build stronger bonds between communities and the police, which will help us to confront and resolve the often difficult and emotive issues that the police tackle on our behalf, all in a spirit of openness and respect. By doing so, our police officers will be able to have more confidence in how they do their job and will gain greater support from across all our communities. I'm confident that all of this, in turn, will lead to our city becoming a fairer and safer place for everyone.

# 1. Introduction

This Action Plan is focused on the Metropolitan Police Service (MPS) as one of the capital's core public services and one that the Mayor has direct oversight over. It responds to concerns set out by Black Londoners, Black-led community organisations and those representing the views of Black Londoners about the lower level of Black representation in the police service, disproportionality in police powers affecting Black Londoners and a perceived lack of transparency and accountability around the way these powers are used. It forms a part of the wider work being led by the Mayor to promote equality and reduce unjustified disproportionality across London's institutions and society.

The events of recent months, sparked by the killing of George Floyd while being detained by police officers in the US, have brought new momentum to a debate that was seared into the national consciousness by the racist murder of Stephen Lawrence in 1993. Londoners of all ages, races and backgrounds have come together to protest racial injustice and structural racism.

The Macpherson Report, which investigated the MPS' handling of the Stephen Lawrence case, was a landmark moment in British history and race relations. Macpherson exposed the deep-rooted discrimination and prejudice faced for years by Black men, women, and children in our society, describing in 1999 how institutional racism existed in the MPS – a concept the Inquiry defined as:

'The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.' Macpherson went on to say: 'It persists because of the failure of the organisation openly and adequately to recognise and address its existence and causes by policy, example and leadership. Without recognition and action to eliminate such racism it can prevail as part of the ethos or culture of the organisation. It is a corrosive disease.'<sup>1</sup>

The Mayor recognises and welcomes the significant progress that the MPS has made since the Macpherson Inquiry to be a better, fairer and more diverse organisation. There are now over 5,000 Black, Asian and Minority Ethnic officers in the MPS, more than half of all those employed across the UK and up from just over 3,000 a decade ago. Overall, more than 8,000 (18%) of the MPS' total workforce are Black, Asian or from a Minority Ethnic group. Around 4,500 young people are involved in the Met's volunteer cadets programme across every London borough, with over 43% of cadets from Black, Asian and Minority Ethnic communities. There are now Independent Advisory Groups in all of the MPS' Basic Command Unit (BCU) areas and central advisory groups in place for race, disability and LGBTQ+ issues.



However, Black Londoners remain less confident and have less trust in the MPS than white Londoners and that there remains a disproportionality in the way some police powers affect Black Londoners:

- In the 12 months to March 2020, 59% of Black victims of crime were satisfied with the overall service they received from the MPS, compared to 68% of white victims of crime.<sup>2</sup>
- In the twelve months to end March 2020 Black individuals were 3.7 times more likely to be stopped and searched compared to white individuals for any reason – based on 2020 London residential population projections. However, this increased to 7 times more likely for stops related to weapons, points and blades and 7.4 times for stops related to Section 60.
- However, this disproportionality varies widely across the 32 boroughs when compared to the resident population. For example, in the twelve months to March 2020, Black individuals were almost 12 times more likely than white individuals to be stopped and searched in Kensington and Chelsea, 7.7 times more likely in Richmond Upon Thames and 7.4 times in Wandsworth. In comparison, over the same twelve months Black individuals were as likely as white individuals to be stopped and searched in Barking and Dagenham (1.1) and Newham (1.4).
- This is also apparent for stops related to weapons, points and blades and Section 60. In the twelve months to March 2020, Black individuals in Kensington and Chelsea were 21.7 times more likely than white individuals to be stopped for weapons and 32.7 times more likely for section 60 stops. This compares to Black individuals in Barking and Dagenham being 1.5 times more likely to be stopped and searched for weapons and Black individuals in Enfield being 2 times more likely to be stopped under section 60.
- In the financial year 2019-20, Black Caribbean people (48%) were 28 percentage points less likely to feel the police use their stop and search powers fairly compared to the overall response to this question (76%) in the Mayor's Office for Policing and Crime (MOPAC) Public Attitude Survey.
- Young Black African-Caribbean men are disproportionately represented on the MPS Gangs Violence Matrix. A MOPAC Review found that they constituted 80 per cent of those on the Matrix, and that this was disproportionate to their likelihood of being a perpetrator or a victim of gang violence. Nearly 400 names were subsequently removed.

This data relates to the lived experiences of thousands of Black Londoners. Throughout the consultation for this Action Plan, Black Londoners spoke about their personal experiences and incidents where they believed racial profiling and unconscious bias had influenced the way police officers had treated them and the serious impact these issues have had on them personally, on their families and on the wider community.

These issues have been further underlined by the recent review of a number of stops and searches in London by the Independent Office for Police Conduct (IOPC) which, while reiterating the importance of stop and search as a necessary tactic for keeping people safe, found that the legitimacy of stops and searches was being undermined by: “..a lack of understanding about the impact of disproportionality with regards to race; poor communication; consistent use of force over seeking cooperation; the failure to use body-worn video from the outset of contact; and continuing to seek further evidence after the initial grounds for the stop and search were unfounded”<sup>3</sup>.

The IOPC made a series of important recommendations, including that the MPS takes steps to ensure that assumptions, stereotypes and bias (conscious or unconscious) are not informing or affecting their officers’ decision making on stop and search.

The MPS accept that they need to do more to face and address these issues, and the Mayor has welcomed their acceptance of all of the IOPC’s recommendations for improvement around stop and search.

It was vital that developing this Action Plan was rooted in listening to and respecting one another. The conversations with Black communities and police as part of the consultation for this Plan have been in equal measures challenging, heart-breaking, innovative and inspiring. It has been truly heartening to bring all parties to the table for these vital discussions, and the Mayor is deeply grateful to everyone who has participated.

## 2. How this Plan was created

This is a cross-City Hall initiative launched by the Mayor and involving the Mayor's Office for Policing and Crime (MOPAC), the Greater London Authority (GLA) and London's Violence Reduction Unit (VRU), working together with the Metropolitan Police Service (MPS) and organisations representing London's Black communities. The development process involved three sessions bringing together community groups and MPS officers, a session bringing together young people, the VRU and operational MPS officers, a round-table with Black victims of crime and a final workshop bringing together all of these groups of stakeholders to review and comment on the emerging draft. The final step in the development process provided an opportunity for communities and stakeholders from across London to review the draft actions and provide final feedback and comments during a virtual meeting or in writing.

More than 400 individuals and organisations participated in the development of this Action Plan. This includes representatives of more than 100 civil society organisations – 45 of which are Black-led – working with and within Black communities on a variety of areas, including youth work, work with older people, criminal justice and human rights and education.

Groups consulted include:

- *Another Night of Sisterhood*
- *Art Against Knives*
- *Att10tive*
- *Black Men for Change*
- *Black Training and Enterprise Group*
- *Brent Stop and Search Community Monitoring Group*
- *Charter School*
- *Children's Rights Alliance / Just for Kids Law*
- *Criminal Justice Alliance*
- *Croydon Community Leaders*
- *Croydon Stop and Search Community Monitoring Group*
- *Croydon Youth Voice*
- *Dope Black Women*
- *Ealing Stop and Search Community Monitoring Group*
- *East London Advanced Technology Training*
- *Four Square People Services*
- *Hackney Account*
- *Hackney CVS*
- *Hackney Quest*
- *Hackney Stop and Search Community Monitoring Group*
- *Hammersmith & Fulham Stop and Search Community Monitoring Group*
- *Haringey Council*
- *Haringey Stop and Search Community Monitoring Group*

- *Havering Safer Neighbourhood Board*
- *Havering Stop and Search Community Monitoring Group*
- *Hodge Jones & Allen*
- *HR Sports Academy*
- *Independent Office for Police Conduct*
- *Independent Office for Police Conduct (IOPC) Youth Representatives*
- *Inspire!*
- *Jill Dando Institute for Security and Crime, University College London*
- *Justice for Black Lives*
- *Juvenis*
- *Kensington and Chelsea Council*
- *Kensington and Chelsea Safer Neighbourhood Board*
- *Legacy Onside*
- *Lifeline Projects*
- *Ligali*
- *The London Assembly*
- *London Councils*
- *Mentivity*
- *Merton Stop and Search Community Monitoring Group*
- *Metropolitan Police Service (MPS)*
- *MPS Black Police Association*
- *MPS Race IAG Monitoring Group*
- *Newham Council*
- *Newham Stop and Search Community Monitoring Group*
- *Notre Dame School*
- *Nubian Life*
- *Operation Shutdown*
- *Peer Outreach Workers (GLA)*
- *The London Assembly Police and Crime Committee*
- *Positive Role Models CIC*
- *Project 10/10*
- *Raw Media*
- *Richmond Stop and Search Community Monitoring Group*
- *Rise Projects*
- *Safer London*
- *Safezone Initiative*
- *Shoreditch Trust*
- *Southwark Young Advisors*
- *Spark2Life*
- *Spiral Skills*
- *Sport Steering Group*
- *Stop & Search Youth Reference Group*
- *StopWatch*
- *SYDRC*
- *The Crib*
- *Tower Hamlets Stop and Search Community Monitoring Group*
- *Waltham Forest Stop and Search Community Monitoring Group*
- *Waltham Forest Young Advisors*
- *We Are Excellent Youth Inspiring Services*
- *YouthZone.*



### 3. Better use of police powers

In the British system of policing by consent, as a society we agree to grant the police specific powers – which can include intruding into people’s lives, depriving people of liberty and using reasonable force – in order to protect the public. These powers are vital – for example stop and search is taking deadly weapons off the streets of London every day, and the Mayor continues to support the MPS in increasing the use of intelligence-led and professionally conducted stop and search as part of the citywide efforts to prevent violence. This Plan also recognises the serious risks police officers face on duty and the need to ensure that they have the powers, training and equipment they need to keep safe while protecting the public.

However, the granting of these powers is done so with the understanding they are used in a reasonable way. Used inappropriately, confidence in policing will fall. Disproportionality can also arise, and data shows that it is Black Londoners who are often those who suffer most from this disproportionality. During the consultation, Black Londoners spoke vividly about the harm done to relationships between the MPS and London’s Black communities resulting from incidents in which they felt Black Londoners have been unfairly treated, injured or have died following contact with the police.

This Action Plan seeks to address the historical harms and disproportionalities, and to work to prevent them from happening in the future.

During the consultation for this Action Plan, stop and search was the most frequently raised example of disproportionate policing of Black Londoners by the MPS. Participants in the consultation spoke of their perceptions about unfounded or unprofessional stops that had either happened to them personally or to people they knew and spoke of the damage these stops were doing to relations between the MPS and Black communities. These concerns are underlined by the recent investigation by the IOPC into the use of stop and search by the MPS, while recognising it as a tactic for keeping people safe.

The IOPC has made recommendations on many of the same issues, including taking steps to ensure that officers better understand the impact that use of stop and search can have on people from communities disproportionately affected by it; the need for more work to reduce the risks of stereotyping and bias in decision-making; and calling for better communication from officers when engaging with individuals being stopped. The Mayor has welcomed the MPS’ acceptance of all of the IOPC’s recommendations arising from their review.

## ENSURING ROAD TRAFFIC STOPS ARE FAIR AND PROPORTIONATE

Road traffic stops – a widely used police tactic for tackling motoring offences and supporting efforts to disrupt violence and drug dealing – were raised as a concern for many of the same reasons as other stops – particularly perceptions of racial profiling and stops of Black individuals, especially Black men, in expensive cars. There were also concerns about further disproportionality arising from the application of new immigration powers designed to prevent those with irregular immigration status from holding a UK driving licence.

A search of a person or vehicle following the stop of a vehicle under the Road Traffic Act would fall under Section 1 of the Police and Criminal Evidence Act 1984 (PACE), which means that ethnicity data is already being captured and scrutinised. This data shows that Black people are six times more likely than white people to be stopped and searched under the PACE Act in their vehicles – an even greater level of disproportionality than for in-person stops (Black people are four times more likely to be stopped in person than white people).

Currently, the published data does not enable a more detailed look at traffic stops under Section 163<sup>4</sup> of the Road Traffic Act, which is used extensively to deal with road traffic offences such as drink/drug driving, speeding and collisions, and in the investigation of other serious offences. There is currently no requirement to record ethnicity for stops under the Road Traffic Act where there is no subsequent PACE search and no road traffic requirement such as a drink/drug drive test.

This is a blind-spot that must be resolved, and the Mayor has asked the MPS to launch a new pilot project to review samples of vehicle stops conducted under Section 163 of the Road Traffic Act to identify any disproportionality relating to ethnicity. This pilot will be informed by the learning from previous studies into this issue and will enable a better understanding of how these powers are being used, and if they are being used disproportionately, to identify appropriate actions to tackle this. This pilot will begin by the end of 2020 and be carried out over the following twelve months.

The Mayor has also written to the Prime Minister to ask him to use national Government powers to compel police services to collect and publish data on ethnicity of vehicle drivers stopped under the Road Traffic Act, as part of the Home Office Annual Data Requirement. In addition, the Mayor has asked that the Codes of Practice supporting the PACE Act be extended to cover road traffic stops to more clearly define the limits of the powers.

## REVIEWING THE USE OF HANDCUFFS

During the consultation, community participants recognised that handcuffing is often a necessary measure – for ensuring the safety of officers, detainees and the public. However, participants spoke of a widely held perception that it has become the norm for Black people to be handcuffed during stops and searches. They talked about how this feeds community perceptions and anger about racial profiling and unfair treatment. The IOPC have also made clear in their recently published review that handcuffs should not be routinely used in stops and searches.

In recognition of this, and the lack of data on the use of handcuffs during stops and searches by officers, the Mayor has welcomed the Commissioner's review of the use of handcuffing in the MPS. Maintaining a clear focus on officers' safety as well as that of members of the public, the review is considering:

- the legal and policy basis for pre-arrest handcuffing;
- the training officers receive in how and when to use handcuffs;
- improving the data on the extent of handcuff use;
- accountability and recording of the use of handcuffs; and
- looking for digital solutions for improving the accountability, supervision and transparency of handcuffing.

A number of community representatives are involved in the working group for the review, alongside a representative of the Metropolitan Police Black Police Association.

This review will be brought forward quickly, with an update published before the end of 2020.

## EXPLORING THE RELATIONSHIPS BETWEEN CANNABIS, POLICING AND CRIME

Throughout the engagement with communities for this Action Plan, the enforcement of cannabis possession was consistently raised as a key driver of disproportionate policing. In particular, communities raised concerns about racial profiling and young Black men being stopped and searched by MPS officers solely on the grounds of 'the smell of cannabis'.

The College of Policing Stop and Search Authorised Professional Practice (APP)<sup>5</sup> – that all officers in England and Wales are expected to have regard to in carrying out their duties – sets out that searches are more likely to be effective and legitimate when their grounds are based on multiple objective factors. The IOPC follows the APP in recommending that the MPS ensures officers are not relying on the smell of cannabis alone when deciding to stop and search someone, and use grounds based on multiple objective factors. The MPS' acceptance of the IOPC's recommendation in this regard is welcomed. Through the oversight mechanisms set out later in this document MOPAC will scrutinise the MPS to ensure that Authorised Professional Practice is followed around searches based on multiple objective factors, and that officers ensure that where searches are based only on the smell of cannabis that their grounds and rationale are clear and fully documented.

The actions put forward throughout this Plan are intended to address actual and perceived bias and provide greater accountability for the reasons for – and conduct of – stops and searches. However, there are also wider questions about how to reduce the harm caused by cannabis in society – a debate ongoing in this country and around the world. The Mayor has called for a national, evidence-based conversation on cannabis laws, how they are enforced and how to support those suffering from addiction. To inform this debate, MOPAC will commission independent academic research, using open-source data, to assess the effectiveness of cannabis enforcement in relation to tackling violence in London. This research will begin before the end of 2020.

## PROTECTING YOUNG BLACK PEOPLE

Children and young people were at the heart of the conversations that fed into this Action Plan. Some spoke about the impact of their personal experiences of being stopped and searched and how the treatment of other Black people by police in London and around the world made them feel.

Others talked about feeling more afraid, not safer, when they saw police officers. They spoke about their fears about violent crime and their hopes for better relationships with the police. Youth workers also spoke about incidents where they observed police officers responding to Black children as though they were inherently dangerous, not as children.

Amongst the starkest feedback from the consultation was that of Black parents, who in many cases were worried not only about protecting their children from crime but also from the police. They spoke of their fears about their children being treated unfairly or unethically by the police because of their race. They spoke about having to have ‘the talk’ with their children about how to behave around police officers to keep safe, just as they had had the same talk from their parents years ago.

A range of safeguarding arrangements for children and young people coming into contact with the MPS currently exist. While children and young people who have been arrested can get specialist help and support when they come into custody, more consideration needs to be given to those young people who are stopped and searched and found not to be doing anything wrong, but who might still be at risk of harm.

While in the vast majority of these cases, safeguarding measures such as referrals to social services wouldn’t be needed, it is important that safeguarding and wellbeing is routinely considered by officers when stopping under 18s, regardless of the outcome. The MPS in Haringey are working with Haringey Council safeguarding leads to review the safeguarding response to under-18s who are repeatedly stopped and searched. This work will identify how best to ensure that contextual safeguarding<sup>6</sup> is at the centre of those interactions and where there are wider concerns these young people can benefit from timely support and interventions.

6. Contextual safeguarding recognises that a child may be at risk from multiple factors outside the family home, which need to be understood and addressed to keep them safe (Dr Carlene Firmin, University of Bedfordshire)

## 4. Working together to make Black communities safer

Data shows that Black communities are less confident than their white counterparts that the police do a good job. In June 2020, data from the MOPAC Public Attitude Survey showed that 51% of Black Londoners were confident that the police do a good job in their local area, compared to 57% of white British Londoners. MOPAC data indicates that this confidence gap in London widened further following the death of George Floyd in May 2020.

Black victims of crime are also less satisfied with the overall service they receive from the police. Again, in June 2020 data showed that 68% of Black victims of crime were satisfied with the service they received from the MPS, compared to 75% of white Londoners.<sup>7</sup> In order that all communities feel able to trust their police service and have confidence that they are there to keep them safe, this must be addressed.

Equally, the disproportionality in victimisation and offending in London's Black communities must also be confronted and addressed, particularly the horrific toll being taken by violent crime:

- Less than one per cent of all young Black Londoners are involved in serious youth violence, either as victims or perpetrators,<sup>8</sup> but this minority of offenders has a severe impact on the wider community. Over the last three years from September 2017 to August 2020, 94% of charged homicide offenders were male, 58% were Black and 30% were white. 42% of charged homicide offenders were teenagers, and of those 75% were Black.
- Based on 2018/19 data, BAME people represent 41% of London's population but make up 59% of homicide victims (2019) and 78% of those charged with homicide.
- Between 2008-2018, Black Londoners were 1.8 times more likely to be victims of knife crime than non-Black Londoners and five times more likely to be charged than non-Black Londoners.

It was clear throughout the consultation sessions for this Action Plan that while a small minority are involved in crime, their offending has a wider impact on many Black families both directly and indirectly. Communities were clear that they must be an integral part of the solution to this problem.

7. <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-criminology/analysis-and-statistics/public-voice-dashboard>

8. <https://data.london.gov.uk/dataset/a-public-health-approach-to-serious-youth-violence>

Community feeling reflected different views on how to tackle the minority of people involved in violence. Some favoured police enforcement while others felt that those at risk of offending need support to tackle the underlying causes of their behaviours and there be more positive alternatives/opportunities available. The Mayor's view is that both of these approaches are needed.

There are many Black Londoners, community activists and leaders working tirelessly, often as volunteers, to support their communities. The Mayor will continue to invest and support this important work, and to encourage all members of the community to continue to come forward to help. Communities have crucial insights and information that can help public and community-based services such as social services and the NHS to access and support those most in need and help the MPS to target its efforts more effectively on the individuals causing harm.

A crucial way this Action Plan is seeing to improve the trust of London's Black communities in the police is to step up efforts to make sure the MPS is representative of our diverse city. Key to this is ensuring that the organisation is welcoming and inclusive to Black Londoners and is one in which they can build a lasting and successful career serving our capital.

The Mayor continues to encourage Black Londoners to consider joining the MPS as police officers, police staff and Special Constables, joining more than 8,000 BAME officers and staff already employed in the MPS, and bringing their experiences, insights and skills to help keep all of London's communities safe and confident.

The MPS Volunteer Police Cadet scheme (VPC) is a success story of how full community representation and engagement can become a reality in policing. The scheme involves young people in crime prevention and community activities and teaches basic knowledge in policing activity including arrest and custody procedures, first aid and conflict management.

Open to all young Londoners, the scheme also plays a significant role in involving, supporting and protecting young Londoners at risk of being drawn into antisocial behaviour and crime or from becoming socially excluded. The scheme currently involves more than 4,000 young Londoners, 43% of whom are from Black, Asian and Minority Ethnic backgrounds.

Through this scheme, dedicated officers are helping to harness the community spirit of these young Londoners and help them to develop skills and confidence that will benefit them throughout their lives. The Mayor and the Commissioner are determined to build on this success to create more opportunities for Black Londoners throughout the police service.



## BUILDING BETTER RELATIONSHIPS WITH CHILDREN AND YOUNG PEOPLE

Building relationships of trust between young people and the police is vital which, done properly, can carry on into adult life. Keeping children and young people safe is one of the Mayor's key priorities and he strongly supports the work of Safer Schools Officers (SSOs). SSOs are an important means of providing access to policing for young people, whether that be for crime prevention and safety advice or support on concerns about crime that they might have. SSOs also play an important role in helping to ensure that schools are a safe place to learn. There were around 300 of these officers in 2017 and this number has increased to over 500 today.

Some of the Black parents and carers who participated in the consultation for this Plan were concerned that SSOs represented over-policing and criminalisation of Black children from their earliest years. This echoes findings from a Runnymede Trust report in June 2020 on teachers' views on police officers in secondary schools in Greater Manchester.<sup>9</sup> Others felt that positive interactions between Black students and police officers in schools were an important way of building better relationships and helping officers to understand the lives of young Black Londoners. Most recognised that Safer Schools Officers had an important role in keeping children safe from crime, but – as with all police officers – there is a duty (under the Public Sector Equality Duty) to consider how the work of SSOs affect people who are protected under the Equality Act. In MOPAC's 2018 Youth Voice survey of 11 to 16-year olds in London, 43%, (1,847 of 4,327) of young people who were aware of their Safer Schools Officer

said this officer made them feel safer at school. Similarly, the majority of young people who were aware of SSOs said they would feel confident speaking to their Safer Schools Officer if a crime were to happen to them or they were worried about something (56%, 2,409 of 4,327), although 31% (1,363 of 4,327) say they would not feel confident doing this. However, those from older age groups and young people from Black, Mixed or Other Ethnic Backgrounds were less likely to say that having a Safer Schools Officer made them feel safer at school, or to say they would feel confident speaking to this officer.<sup>10</sup>

The MPS will continue to ensure that the work of the Safer Schools Officers is monitored and assessed to ensure the positive work they do can continue and that there are no disproportionate impacts for Black children. To ensure that the concerns of Black parents around the consistent presence of police officers in London's schools remain in focus, from October 2020 MOPAC will regularly consult parents in London about their views on Safer Schools Officers via its Public Attitudes Survey. MOPAC will analyse the findings by ethnicity, to help identify differences in perceptions between different communities and to inform action to address any disproportionality.

In addition, MOPAC will continue to incorporate questions about Safer Schools Officers in its regular Youth Voice survey of children and young people in London. Run every three years and reaching more than 7,000 young Londoners, the survey provides a detailed snapshot of how young people in London feel about policing, crime and safety in their city.

9. <https://www.runnymedetrust.org/racism-in-secondary-schools>

10. [https://www.london.gov.uk/sites/default/files/youth\\_voice\\_survey\\_report\\_2018\\_final.pdf](https://www.london.gov.uk/sites/default/files/youth_voice_survey_report_2018_final.pdf)

## ENSURING THE NEEDS OF BLACK WOMEN VICTIMS OF CRIME ARE MET

During the consultation, Black women spoke of their perceptions of the unfair treatment of Black men by the police. This is important, as these personal experiences had prevented allegations being taken seriously, making them more reluctant to call for help and report crime. Without crucial information, it makes the police's job of catching and prosecuting criminals all the more difficult.

This is particularly true for Black female victims of sexual violence and/or domestic abuse, where the perpetrator is also Black. Some participants in the consultation explained that lack of trust and confidence in the police and bad past experiences can lead to a fear that the perpetrator (often a member of their family) will not be treated fairly by the police. As a result, some Black women choose not to report, putting them at additional risk of further harm in the future.

Immigration status was also raised as a key issue impacting the relationship between Black women and the police. We have heard from voluntary sector partners of occasions where MARACs<sup>11</sup> have allowed Home Office officials to sit in on meetings, which has led to concerns about the recording of immigration cases, and the risk of detention and deportation. It is unacceptable for the threat of detention or deportation – however genuine or imagined – to deter victims of serious crime from coming forward to seek help and MOPAC will launch a review of MARACs in London by the end of 2020.

This will establish the facts around attendance at MARACs and consider whether and how concerns about immigration status and perceptions of policing deter women from reporting crimes committed against them, even when their life is in danger.

There is also a need to do much more to ensure the wider criminal justice service – including the Crown Prosecution Service (CPS) and HM Courts and Tribunals Service (HMCTS), are removing barriers to Black women coming forward and pursuing their cases through the justice process. As a result of the findings of the Action Plan consultation, London's Independent Victims' Commissioner, Claire Waxman, will launch a new consultation with Black women and the End Violence Against Women (EVAW) coalition to understand their specific needs and experiences. Out of this, any recommendations directed at the wider criminal justice organisations in London will be pursued. This work will begin in November 2020 and will report in early 2021.

11. Multi Agency Risk Assessment Conferences – meetings of different agencies including police and councils where high-risk domestic abuse cases are discussed and measures put in place to protect vulnerable victims/survivors.



## IMPROVING OUR COMMUNITY ENGAGEMENT STRUCTURES

It is important to ensure there are more meaningful opportunities for Black communities to engage with the police and with MOPAC on their strategies, plans and service delivery. It is also crucial that Black communities can see the impact of their engagement.

This is why the Mayor and Commissioner committed to restoring real neighbourhood policing with the provision of at least two Dedicated Ward Officers (DWOs) and one PCSO in every ward in London – locally based officers who both know and are known by the community they serve. This commitment was delivered in 2017 despite the climate of austerity, demonstrating what can be achieved with the will to effect change.

A variety of engagement structures already exist, including Safer Neighbourhood Boards, Ward Panels and Independent Advisory Groups, which provide specialist advice to the MPS about different aspects of their work and in critical incidents. The members of these Groups perform a vital – and much appreciated – service for London. However, it is clear from the consultation for this Action Plan that more needs to be done to build credibility with Black Londoners and that there is more to do to ensure that London's Black communities, particularly young people, are proportionately represented on these groups.

For this reason, MOPAC and the MPS have committed to work with communities to review all of their existing community engagement mechanisms, to make them more transparent and to identify accessible opportunities for Black communities to be engaged. Work on this review will begin immediately.

Supporting this work, the MPS is also working to develop a 'Handbook of Engagement' which will be shared with communities, enabling better joint-working to identify further opportunities for how the Service can listen and serve its communities, and in particular Black and ethnic minority communities.

The Mayor welcomes the MPS's plans for taking a more joined-up approach to community engagement and making sure it underpins their wider work. These approaches have, in the past, been led by different teams, which makes it difficult to know what is working and what could be improved. This new proposed holistic approach will help to identify where further engagement needs to be focused – whether that's in specific parts of London, or with specific communities across the capital.

The success of this approach will be measured both quantitatively through the Public Attitudes Survey and qualitatively – making sure the whole story is understood beyond numbers by looking for evidence of deeper and stronger relationships with Londoners. Although everyone within the MPS will receive continuous professional development, there will be a focus on delivering bespoke training for Safer Schools Officers, Dedicated Ward Officers, Youth Engagement Officers, Youth Supervisors and Volunteer Cadet Leaders.

## 5. A police service that better represents and understands Black communities

The British model of policing by consent is built on the idea that the police are the public and the public are the police – police officers are first and foremost ordinary people like everyone else.

Over decades, it has been a challenge for the police to keep up with the changing population of London. Police officers can serve for over 35 years and the laws on recruitment are restrictive, making the process of effecting change across an organisation as big as the MPS a lengthy one driven predominantly through recruitment which from year to year can vary significantly. Nonetheless, concerted efforts have been made to recruit people from across London's diverse communities and real progress has been made - today the MPS has more than 5,000 BAME police officers, compared to 3,100 BAME officers in post just a decade ago.

But the MPS remains disproportionately white and male. Whilst three of the MPS' 18 most senior police officers are BAME, Black officers remain under-represented in management ranks due in part to the way most police officers must work their way up through every rank to reach senior command – a process that takes many years.

The impact of this is significant – during the consultation Black Londoners highlighted that they do not see themselves fully reflected in their own police service. Some felt that a lack of diversity and cultural knowledge contributed to incidents where they felt officers had interacted with them based on stereotypes, with low regard for their dignity and respect.

The police service loses out too - on vital cultural experience, competency and knowledge at every level of the organisation, which can be critical to working effectively with London's diverse communities to prevent crime and keep people safe.

Alongside action to improve police training, scrutiny and accountability, taking steps to increase the diversity of the MPS workforce is a key element of the holistic approach needed to resolve the issues of trust and confidence highlighted by communities during the consultations for this Plan.

### INCREASING THE NUMBER OF POLICE OFFICER RECRUITS FROM LONDON'S BLACK COMMUNITIES

Recruiting a representative number of Black officers is a key element of the wider work of building a more representative police service. Building on significant improvements over many years, the MPS is aiming for 16% of its officers to be BAME<sup>12</sup> by 2022, 21% by 2024 and 28% by 2030. Whilst this may not sound challenging and is not reflective of the BAME population of London, the nature of a policing career means it is difficult to make even more rapid change from the historically white, male officer workforce.

To support this new, challenging aim for the diversity of the MPS, new aims on recruitment of officers have been agreed. The MPS want to see as many as 40% of new recruits from BAME communities from 21/22. This is an ambitious aim, as 45% of current applicants come from outside of London, where the proportion of BAME communities is just 10%.

While these aims are welcome, concerns were raised during the consultation for this Action Plan that the MPS' current use of the BAME grouping to measure recruitment may mask progress on recruiting Black officers specifically. To address this, the MPS will set specific aims for the recruitment and promotion of Black officers.

The Mayor and the Commissioner have jointly supported London-only recruitment for police officers, which was introduced in 2014. Reluctantly, both agreed to suspend this criterion in 2018 to meet the urgent need for more officers to help tackle increasing violence in London. The MPS is now more confident that it will hit its recruitment targets and will imminently re-introduce the London residency criteria for most new recruits. This will help contribute towards recruits having the skills and knowledge to police our diverse global city. This will be supported by targeted investment of £300,000 for new outreach work on recruitment to encourage young Black Londoners to consider a career in policing.

The Mayor will also lobby the Government to review the legislative framework for police officer recruitment to ensure it is fit for purpose and supports efforts to maximise the number of Black recruits.

## **ENSURING COMMUNITIES ARE A PART OF POLICE LEARNING AND DEVELOPMENT**

To work well with and within communities, police officers need an understanding of the facts, events, values and beliefs that have shaped those communities. The MPS already involves communities in some of their learning and development, but not consistently.

That is why the MPS are going to ensure communities are more closely involved in the design of new police learning and development by default and a new Learning and Development Community Reference Group will be established to facilitate this.

In support of broadening the conversations with communities on the use of stop and search, the MPS will mobilise a local pilot in the Central South BCU (Lambeth and Southwark). Over a six-month period, this will bring together a mix of 500 front line operational officers (new recruits and established officers) within community led workshops on cultural equality with the aim of developing a deeper understanding of real-life experiences of stop and search and its impact on both individuals' and the wider communities' trust and confidence in the MPS.

As part of this Action Plan, the MPS has also committed to incorporate direct community input into specific aspects of the training given to new recruits across the service. This community-led training will centre on the following areas and be made possible by an additional investment of c£1m per year for three years.

- **Local Community Familiarisation** – new recruits will spend a proportion of their initial learning understanding the history of the local area they will police, including learning the cultural history, lived experiences and the challenges the communities have faced. This will be supplemented by a bespoke local Community Immersion Project.
- **Refreshed Safety Training** – the officer safety training that new recruits receive will be enhanced with a planned extra three days centred on how the MPS equip recruits with additional skills to deal with and de-escalate potential conflict situations to improve safety for the public and for those on the frontline.
- **Refreshed Stop and Search Training** – during their initial learning new recruits will spend time understanding the importance of cultural awareness and the impact of issues such as unconscious bias and disproportionality on communities across London, specifically Black communities. This includes scenario-based role plays such as ‘trading places’ exercises, where officers will be put in the shoes of the people they stop.

Work on this to engage communities has already begun. The improved recruit learning and development packages will start to be rolled out from January 2021, with community involvement into aspects of recruit training delivery from April 2021 onwards.

It is critical that all officers continue to benefit from community inputs into their professional development as they progress through their careers, particularly for those policing tactics that have the greatest impact on community confidence and for teams such as the Territorial Support Group (TSG) who use these tactics most often due to the challenging role they perform and whose interactions with Black communities have created the most concern within those communities.

As part of this Action Plan the MPS has committed to continue involving communities in the design of refreshed safety training, undertaken annually by all officers, including strengthened procedural justice learning outcomes. Work to engage external community stakeholders within the design process will take place between October 2020 and March 2021, with a wider roll-out planned from April 2021.

In addition, the MPS has commissioned Middlesex University to develop a cultural awareness toolkit and a two-part training video, which will include an explanation and demonstration of the principles behind procedural justice – giving people assurance that they are being treated in a fair and just way by authorities – a vital concept for the legitimacy of policing. Once completed the toolkit will be made available to officers and staff through the MPS intranet. It is intended to be an ongoing resource and will be reviewed to ensure that officers and staff find the toolkit beneficial and applicable to their daily duties.

## **SUPPORTING BLACK OFFICERS TO PROGRESS THROUGH THE RANKS**

Representation in the police service is about more than just the overall numbers of officers. It is vital that representation stretches up through all the ranks, with Black officers advancing through their careers to more senior roles.

That is why the Commissioner will set challenging aims to increase the number of Sergeants and Inspectors from BAME groups and will set a specific aim for Black officers. The MPS already provide positive action workshops to support BAME officers in advance of each promotion process, which have proved successful in increasing representation at senior ranks.

BAME senior role models are also critically important and the MPS are committed to ensuring that all those in leadership roles feel supported and have the right access to networks and mechanisms in order to develop.

This will be supported by MOPAC committing £400,000 per annum, ring-fenced additional funding to the MPS from City Hall over and above core police funding, to build on the positive progress already made by the MPS in eradicating disproportionality within its Promotions Framework and to further strengthen the career development support given to Black officers and staff so that they are in the very best position to compete through promotion processes and talent schemes. The MPS will publish details of this scheme at the end of January 2021, following consultation with staff associations.

## **IMPROVING FAIRNESS WITHIN THE MISCONDUCT AND GRIEVANCE PROCESS**

Everyone deserves fair and transparent treatment at work. While research conducted by MOPAC shows that BAME officers in the misconduct process are treated fairly and proportionately, currently the proportion of BAME officers referred into the misconduct system is twice that of white colleagues. Similarly, more BAME officers and staff raise grievances about the way they are treated by colleagues.

This unfairness is not unique to policing and the Mayor has welcomed the MPS' commitment to continue to significantly reduce disproportionality within the grievance and misconduct processes by 2024. The MPS has put in place a checks and balances process to review internal referrals into the misconduct process, to ensure opportunities for learning have been fully explored. The Mayor will hold the Commissioner to account for ensuring that this happens.

## **NOT 'SIMPLY PART OF THE JOB' – SUPPORTING OFFICERS AND STAFF AFFECTED BY HATE CRIME**

Londoners recognise and appreciate police officers and staff for the work they do, and the difficult, dangerous nature of the situations they confront on a daily basis. While, sadly, police officers and staff of all backgrounds experience abuse from members of the public while going about their work, analysis by the MPS has found that BAME officers and staff are disproportionately affected by racial abuse.

The Mayor fully supports the Commissioner's clear message to her officers and staff that it is unacceptable to be verbally as well as physically abused due to your race, faith, gender, sexual orientation, disability or other protected characteristic and this is not 'simply part of the job'.

Recognising the impact of this kind of abuse on officer and staff wellbeing, the MPS has extended support arrangements to colleagues who have suffered a hate crime verbally as well as those who have been assaulted whilst in the execution of their duty. The MPS' Operation Hampshire was launched in March 2016 to improve the MPS' response to incidents where officers and staff had been physically assaulted on duty. This year, the MPS is expanding the support provided via Operation Hampshire to support officers and staff who are victims of all hate crime while on duty. This is to ensure that every officer or member of staff who is assaulted, or subjected to a hate crime or both, is treated as a victim and that they have meaningful support.



## 6. Holding the police to account for what they do

Throughout the development of this Action Plan, Black Londoners repeatedly spoke of their feelings that the MPS was not being held accountable on their behalf. While the police are statutorily held to account by a number of bodies including MOPAC, the Home Office, the Independent Office for Police Conduct (IOPC) and Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), many felt that when things went wrong, nothing happened, and that justice was not being done. Participants asked what more the Mayor could do to hold the MPS to account and involve communities more directly in that work in their local area and across the city - actions set out in this chapter.

### INVOLVING COMMUNITIES IN THE SCRUTINY OF CITY-WIDE POLICING

One of the most important elements of this Action Plan is addressing the concerns of Black Londoners about the lack of transparency that they feel exists around the activities of citywide police teams such as the Territorial Support Group (TSG) and the City Hall-funded Violent Crime Task Force (VCTF). These units perform important work to tackle violence and use a variety of intrusive tactics in the line of duty but are not explicitly covered by existing local community-based scrutiny mechanisms such as the Stop and Search Community Monitoring Groups and Safer Neighbourhood Boards.

To address this, MOPAC will create a new group to actively involve communities in its scrutiny of the MPS' citywide activities and pan-London teams such as the TSG, RTPC and the VCTF, and in the way that

complaints about the use of intrusive tactics are handled. In November 2020 MOPAC will start a new, three-month project with communities to co-design and launch a new Disproportionality Scrutiny Group, to increase confidence that these powers are being used fairly and proportionately.

This work will include:

- Increasing transparency in the use of police tactics by identifying issues, common themes, and trends in the use of police powers and how these affect different communities; and
- Influencing police learning on the use of their powers to ensure they are used fairly and justly.
- Holding the MPS to account in a more transparent way for how complaints are handled and any differences in outcome by ethnicity; and
- Holding the MPS to account for making sure best practice is observed, that lessons are learned when things go wrong and that these lessons are communicated to the public.

Supporting this work, MOPAC will produce a quarterly race equality audit, reporting on the MPS' use of its powers, including for example, the use of Tasers and strip-searching, publishing this data and holding the Commissioner to account for it.

Much of this data already exists and is in the public domain but can be hard to find. MOPAC will consult communities on what information they would like to see and on how to ensure it is accessible and easy to use. The first of these audits will be published in the first quarter of 2021.

## WORKING WITH THE INDEPENDENT OFFICE FOR POLICE CONDUCT

The Independent Office for Police Conduct (IOPC) plays a vital role in the oversight of the MPS and policing in England and Wales. The IOPC oversees the police complaints system, investigates the most serious matters including deaths following police contact, and sets the standards by which the police should handle complaints. The learning the IOPC finds in its work is then used to influence changes in policing. However, during the consultation for this Action Plan, some participants raised concerns that the IOPC was not challenging enough on the issues of concern to Black Londoners, and that communities did not feel the impact of their work.

The Mayor has welcomed the IOPC's recent report on stop and search at the MPS, which set out clearly a number of key issues and recommendations for improvement. The Mayor also welcomes the IOPC's thematic review into race discrimination, announced in July 2020 and looks forward to subsequent learning from that work. The Mayor fully supports the IOPC's mission to improve public confidence in policing by ensuring the police are accountable for their actions and lessons are learnt.

There is a shared responsibility to work together to influence change in policing and improve the confidence of all Londoners in the MPS.

## SUPPORTING COMMUNITY SCRUTINY OF LOCAL POLICING

Currently, Community Monitoring Groups operate around London, supported by MOPAC, to enable community members to participate in scrutiny of the use of stop and search powers by local police. MOPAC will overhaul its community monitoring structures to ensure that London's diverse communities are better represented, can have a role in monitoring a wider range of police powers, including stop and search and the use of Tasers, and complaints. This represents a significant increase in the scope of community scrutiny of local policing and will inform MOPAC oversight of the MPS and, ultimately, police practice. In making these changes, MOPAC will work with communities to ensure that the new arrangements reflect what local people think is needed in their area. Proposals for the new arrangements will be developed with communities and brought forward by February 2021.

This work will seek to build on the good practice identified in the Criminal Justice Alliance's Stop and Scrutinise report<sup>13</sup> and ensure community monitoring is directly linked to officer learning and supervision. This includes consideration of the concept of a reasonable grounds panel to assess stops where the grounds used are not clear and support officer learning.



## MAKING BEST USE OF BODY WORN VIDEO

The rollout of Body Worn Video (BWV) cameras is a significant step forward in increasing the accountability and transparency of policing. Today the MPS has issued around 22,000 Body-Worn Video cameras to all front-line officers – the largest rollout of this technology in the country.

As a vital part of ensuring accountability and transparency in police interactions with the public, every effort should be made to ensure that BWV is being used consistently. Currently, BWV is used in 92% of interactions between police officers and the public where it should be used, as in extreme circumstances such as an immediate emergency or threat of harm, there is not always the opportunity for officers to switch the cameras on immediately. While recognising and accepting these circumstances, the Mayor supports the IOPC's recommendations in their review of stop and search that the MPS should take steps to improve further the already high level of compliance around the use of body worn video by officers switching their camera on as soon as possible when interacting with members of the public, and for supervisors to take a more proactive role in ensuring body worn video is used appropriately. The MPS has accepted these recommendations and the Mayor will oversee their efforts to improve compliance and supervision.

Body Worn Video should also be a central element of community scrutiny of policing, providing irreplaceable insights into specific incidents, but it must be done safely and in line with data protection principles. The MPS has put in place the necessary safeguards and has reinstated Body Worn Video reviews by Community Monitoring Groups from October 2020. MOPAC will also lobby the Home Office to revise the current Code of Practice to make the review of BWV footage a mandatory requirement for community scrutiny.

During the consultation with Black Londoners, concerns and questions were raised about what happens to the footage, along with suggestions about making use of the recorded footage to understand wider issues – not just individual incidents.

The MPS hold non-evidential body-worn video footage for 30 days, and the MPS holds a substantial catalogue of footage of stops and searches. This data presents a significant opportunity to research the quality of police interactions with the public and identify areas for improvement that can be incorporated into police training.

MOPAC and the MPS will start work immediately to jointly research a sample of Body Worn Video footage, to:

- examine the nature of stop and search interactions, particularly when there is escalation or de-escalation in the behaviour of officers or the individual(s) being stopped; and
- understand how different groups of people experience and interpret stop and search interactions.

## **STRENGTHENING COMMUNITY OVERSIGHT IN POLICE CUSTODY**

MOPAC is responsible for ensuring there is an Independent Custody Visiting (ICV) scheme in place across London, through which volunteer members of the public attend police custody centres unannounced to inspect conditions and ensure that detainees are being treated in accordance with their rights. MOPAC will further expand the role of Independent Custody Visitors in London through a new process enabling ICVs to look through complete custody records. These records detail the detainee's full journey through custody, helping to reveal issues and challenges that previously were not identified. This pilot will begin in January 2021 with a specific focus on the experiences of children in custody, disproportionality and the use of intrusive tactics, such as strip searching.

## **OVERHAULING PUBLIC SCRUTINY SESSIONS**

Oversight and scrutiny of the MPS is a key part of the role of the Mayor and he accepts the challenge from communities that this needs to be more accessible. MOPAC will review and refresh its Justice Matters and Policing Matters meetings, at which the Commissioner and members of her senior team will answer questions on the work of the MPS. These quarterly meetings will be open to the public through online broadcast and, when the Covid-19 situation allows, in-person. MOPAC will also move the in-person meetings from City Hall to venues around London, bringing them closer to communities.

Alongside questioning from the Chair, a process will be put in place for Londoners to submit questions to be asked at these meetings. The first of these refreshed meetings will take place in December 2020, with more details released as arrangements are finalised.

## SUPPORTING LONDONERS TO KNOW THEIR RIGHTS

MOPAC currently produces and provides Know Your Rights leaflets designed with and for young Londoners, containing information on how a stop and search should be conducted, their rights if they are stopped and what to do if they have a complaint or concern about the way they were stopped. By equipping Londoners with knowledge of their rights and explaining the thought processes of officers when stopping someone, the leaflets are designed to promote mutually respectful and informed interactions between police and public when stops take place.

Around 40,000 of these leaflets have been distributed around London, and MOPAC will set up a group including communities and partner organisations to develop a communications plan to ensure that information about people's rights when stopped and searched - and about how to complain - is more widely available, including via digital channels. In addition, MOPAC will work with the IOPC to publicise information on the complaints process more widely and support local initiatives that seek to assist communities in exercising their right to complain.

MOPAC and the MPS will also run a new Complainants Survey asking about people's experiences of the complaints process. This will enable a better understanding of how the journey can be improved. This is important not only for those that have taken the steps to share their thoughts, but also for some individuals that feel there are barriers to doing so. The survey can only pick up those that have made a complaint – and it is clear that not everyone feels like they have the confidence to do so. To seek the views and better understand these barriers holistically, MOPAC will include a question speaking to this in the Public Attitudes Survey and take forward the learning from these surveys to ensure that the complaints process is more accessible.

Anyone who is stopped and searched is entitled to a record of the incident. In London, these are currently only available by visiting a police station. It is vital that it is as easy as possible for people to access this information and the MPS is working with other forces to find a comprehensive solution. In the interim, the Mayor has asked the MPS to make stop and search records available by email to anyone who would wish to receive the information in that way.

## CONTINUED OVERSIGHT OF THE MPS GANGS VIOLENCE MATRIX

In December 2018, the Mayor published a wide-ranging review of the MPS Gangs Violence Matrix. This recognised the Gangs Violence Matrix as having a positive impact on reducing offending or being a victim of violence but found significant and unacceptable problems with disproportionality in the Matrix population and in the processes used to maintain the Matrix. The review recommended a comprehensive overhaul of the database to restore trust in its use and ensure it is used both lawfully and proportionately.

The review, which fulfilled a commitment in the Mayor's 2016 Manifesto and his Police and Crime Plan, included detailed analysis of more than 7,000 people who have been on the Gangs Violence Matrix, together with surveys of frontline local authority staff and those in communities directly affected by violence. It made nine recommendations to make the Matrix more transparent and bring it into line with data protection legislation.

As a result of this review, by February 2020:

- the overall population of the Matrix had decreased by 31 per cent to 2,676 people
- 490 individuals with a 'green harm' banding, including those deemed as having a zero-harm score – reflecting the lowest risk of an individual committing or being a victim of violence – have been removed from the Matrix because there was no longer evidence that they were affiliated with a criminal gang
- The proportion of BAME Londoners on the Matrix decreased from 89 per cent in 2018 to 79 per cent in 2019. The number of people of a Black African Caribbean background added to the database dropped from 82.8 per cent in 2018 to 66 per cent.
- The proportion of under-18s reached the lowest-ever point in the Matrix's history, with a decrease from 14 per cent in 2018 to 6 per cent in 2019. There has also been a reduction in the proportion of under-25s from 72 per cent in 2018 to 64 per cent in 2019.

Alongside this Action Plan, MOPAC has published the latest update on progress against the Gangs Violence Matrix Review to ensure that there is continued transparency and scrutiny around the way it is used and managed, the proportionality of the Matrix population and the Equality Impact Assessments of the Gangs Violence Matrix.

## MAKING DATA MORE ACCESSIBLE

Today there is more data available about how public services do their work than at any other time in history. While a lot of that data is already available to the public, there are real opportunities to improve what is being published by each organisation and how accessible and useful it is to the public in understanding how the services they pay for are performing. By providing more accessible data, public services can improve the way the work and also enable Londoners to play a stronger and more informed role in holding all of their public services to account.

As part of the Action Plan, MOPAC, the MPS and the GLA will review how data sharing between organisations is working and make recommendations on how more data can be made accessible, in line with work with other London public services. In addition, the MPS will sign up to the Voluntary Code of Practice for Statistics in line with MOPAC and the GLA, ensuring that data is used to a consistent and high standard by all parties.

## 7. Next steps

The work ahead is difficult, but it is essential. With this Action Plan, the Mayor wants to bring Londoners, police and other partner agencies together to move forward towards a police service that all communities have trust and confidence in – a critical element of realising the ambition of a city where all public bodies and institutions are actively anti-racist and have the confidence of all citizens.

There have been several reviews that have previously considered community-police relations and the impact of policing on different communities. As part of the development of this Plan, several of these reviews have been revisited to consider whether any of their recommendations had yet to be implemented. These were:

- The Macpherson Report
- The Morris Inquiry
- The Lammy Review
- The Review of compliance with the Victims' Code of Practice in London
- The London Rape Review.

Throughout the consultation, participants expressed the sense of cynicism and fatigue within London's Black communities about more reviews and reports that make recommendations but don't ultimately lead to tangible change. The Mayor is determined that this Action Plan will be different, and the name Action Plan is deliberately chosen.

The conversations between the Mayor, Black communities, the police, MOPAC, the VRU and the GLA that fed into this document must continue as this Action Plan is delivered. All parties have a role to play in the next stages, working together to build on progress already made, deliver these new actions, and make the positive changes all want to see.

The London Policing Ethics Panel has also reflected on the issues raised by the Black Lives Matter movement, particularly in the context of the continuing challenges of policing public health during the coronavirus pandemic and is to publish two papers addressing the issues of moral repair and ethical community engagement. The MPS and MOPAC will use these reflections to support and inform their response as the Action Plan is delivered.

Black voices will be at the heart of the delivery of this work, and London's Black communities – men, women and young people – will continue to be involved in every aspect of this Plan. To maintain transparency and accountability, the delivery of the Plan will be overseen by a Board co-chaired by the Deputy Mayor for Policing and Crime alongside an independent co-chair, bringing in community voices and expertise.

Ultimately, the core purpose of the Plan is to lay out the actions that will tackle racial inequalities and to ensure the policing of Black communities is fair and proportionate. MOPAC will ensure this Plan is subject to an Equality Impact Assessment to document how any differential impact on Black communities has been considered and mitigated.

## MEASURING PROGRESS

To review the progress made, MOPAC will involve communities in regular meetings reviewing the progress made towards the Action Plan's objectives, what work is underway, what has been completed, identifying barriers to further progress and considering any additional steps required.

The first of these meetings will take place in **February 2021**, with further meetings in **July 2021** and **December 2021**.

To ensure that there is transparency in the delivery of the Actions in this Plan, MOPAC will publish on its website a quarterly update, listing all of the Actions and what has happened over the period towards delivering them.

Following the Mayoral election in **May 2021**, a new Police and Crime Plan – the statutory document in which the Mayor sets the priorities for the Metropolitan Police Service – will be produced and published. MOPAC will conduct specific consultation with Black Londoners to ensure that their views are reflected across all of the Mayor's priorities for policing, crime and justice in London.

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Greater London Authority  
City Hall  
The Queen's Walk  
More London  
London SE1 2AA

[www.london.gov.uk](http://www.london.gov.uk)  
enquiries 020 7983 4000



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