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16th May 2022

Sir Stephen House QPM Acting Commissioner of Police of the Metropolis

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Dear Mayor,

Thank you for your letter of 1st December 2021 about the progress made by the Metropolitan Police Service (MPS) in delivering commitments in your Action Plan for Transparency, Accountability and Trust in Policing. We have continued to work hard on these issues, with regular engagement with MOPAC, so please forgive the delay in sending a formal response letter. Your commendation in your letter of the focus and energy brought to this work by the Deputy Commissioner's Delivery Group (DCDG) is appreciated. I am grateful for their work and that of colleagues across the Met, with City Hall, MOPAC, and our partners and communities in London who contribute to our progress on improving the confidence in us of London's Black community.

As you know, the MPS launched in September 2021 a new Strategy for Inclusion, Diversity and Engagement (STRIDE) 2021-2025¹. It will help us progress our plans to be more inclusive and diverse, and is in line with our new recruitment campaign that showcases stories of our officers from diverse backgrounds to increase applications from Black, Asian and Multiple Ethnic Heritage communities. STRIDE is an organisational priority for me and also supports the objectives in your Action Plan. We will soon be publishing an updated STRIDE Action Plan for 2022-23.

Included in this letter is an annex setting out our responses on each specific Action Plan commitment. We have made good progress and we recognise that there is always more to do. It is also important to acknowledge the impact the Met is having on tackling violent crime, which sadly significantly affects our Black communities. We are having an impact through our shared investment in a clear violence reduction strategy.

I am committed to the Met improving the confidence of London's Black community and of all Londoners in trusting us to keep people safe and trusting us to be an employer of choice for London. A key element of this is ensuring the Met reflects the diversity of London, that our Black, Asian and Multiple Ethnic Heritage officers and staff feel included and are able to progress well through the Met, and that our work has minimal ethnic disproportionality where the levers are within our control.

Principles of procedural justice are also instilled through our community inclusion training approach, and our 'Ride Along Scheme' offers the public the opportunity to experience first-hand our policing of London; opening eyes to the complexity of policing as a profession. This openness is key to us sharing experiences and ensuring our communities influence and experience the truly inspirational work my staff do to keep London safe.

¹ https://www.met.police.uk/police-forces/metropolitan-police/areas/about-us/about-the-met/met-diversity-and-inclusion-strategy-stride/



As we take forward our commitments, it is helpful for us to see the data in your published Action Plan dashboard² that draws on the Public Attitude Survey that is run by MOPAC and speaking to around 12,800 London residents each year. The Action Plan dashboard currently shows that 57% of Black respondents trust the Met, 54% believe the Met treats people fairly, 46% feel the Met does a good job locally, 63% that the Met can be relied upon, 54% that the Met listens to concerns, 61% support the use of stop and search, and 87% support Safer Schools Officers in schools. We of course want trust to be higher and we are working hard to increase it.

We have made significant strides towards making the Met more representative of the community we serve. This has involved the MPS implementing an ambitious programme of activity that has improved the overall success rates for our Black, Asian and Multiple Ethnic Heritage candidates, removing almost all of the previous disproportionality. The aim now is to ensure we attract even higher volumes of candidates into our recruitment process with greater confidence that we and they will not see levels of disproportionality. Our programmes of support for staff, overseen locally by our senior leader cohort of Career Development Officers illustrates our acknowledgement of the need for 'end to end' support for Black, Asian and Multiple Ethnic Heritage officers joining the Met.

I have set out below responses to some of the areas you highlighted in your letter and also actions that I think illustrate the breadth and depth of the impact that we are having on improving our understanding of, and investment in, increasing Black community confidence in the Met. These range from our new handcuffing policy and safeguarding in stop and search work, to community involvement in training and our Cultural Awareness Portal. This letter will also respond to your letter's request about analysis of disproportionality.

We launched a new handcuffing policy on 18th November 2021 as part of our ongoing programme to increase internal awareness of legislation, policy and recording of the use of handcuffs. This includes increased contact time for officers in Public and Personal Safety Training sessions, with greater exploration of handcuffing techniques, de-escalation, justification and rationale recording.

The impact of the change in policy and training is part of a programme of review, supported by our Strategic Insight Unit (SIU), where there will be a retrospective review of the use of pre-arrest handcuffs alongside other use of force, including baton and PAVA. A comparison will then be made of data from the 12 months following the policy launch, to identify any changes in pre-arrest handcuff use or other use of force areas. This will be accompanied by consideration of data in our Directorate of Professional Standards, to assess any changes in recording levels of complaints and misconduct. The Independent Office for Police Conduct (IOPC) were invited to collaborate in the assessment of impact, but at this time have indicated they believe the best course of action is for the MPS to use our own datasets, noting that IOPC data is generally drawn from policing databases.

As we have discussed on many occasions, stop and search is an important tool in policing, a position I know you recognise and support. Its use must of course be lawful and fair while taking account of the current data regarding violent crime offending³. As you outlined in your December 2021 speech on crime⁴, Black Londoners are disproportionately represented as victims and offenders in relation to violent crime. Stop and search is critical in reducing violence, in taking dangerous weapons off the streets that would otherwise cause real harm, to individuals and to communities suffering from violence. We are having impact in reducing the number of victims, but

4 https://www.london.gov.uk/press-releases/mayoral/mayors-speech-on-crime

² https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/policing/action-plan-

³ Carrying out Stop & Search in a manner that is 100% proportionate to the population would involve needing to stop around 50% women and 20% over 60s, which would not match the current data regarding violent crime offending.



there is always more to do and we welcome the efforts by partners and communities to help prevent violent crime.

To help provide a fair understanding of the current picture on this, the MPS is continuing to review London demographic datasets. For example, the Department for Education reports 25% of secondary school students are Black, which is important when considering disproportionality in policing encounters with school age groups. Through the STRIDE External Reference Group we are engaging Black community partners to explore how we review and present this data in an open and productive way, always with the aim of improving Black Londoners' experience of policing.

Stop and search must also be a power that incorporates a clear safeguarding perspective. This is of significant importance when used on children and young people. The work with partners in Haringey Children's Services continues to establish a firm evidential foundation for any necessary change of practice and is illustrative of how the MPS is able to mobilise with partners to protect young people. We look forward to seeing the outcome of this work and any recommendations.

Community involvement in training is now a cornerstone of our learning and development and is a fundamental change in our approach. It includes bespoke activity in Central South BCU, and more broadly in our Learning and Development Command, where we have invested in a full time role to maximise opportunities for community involvement. In addition, creating an active Learning and Development Community Reference Group, with many members having educational and teaching backgrounds, has ensured our training, inputs and resources are culturally competent and appropriate for officers and staff. This has been of great value in creating a new Cultural Awareness Portal, a platform where officers and staff explore current and historical information about London's communities, including the international context of London, as one of the most diverse capital cities.

Going forward, our work on these issues will be fully incorporated in wider MPS diversity and inclusion work in our Crime Prevention, Inclusion and Engagement (CPIE) Command. This ensures all aspects of diversity are progressed together. The future design of CPIE is being developed by key leaders who have taken forward the actions and improvements set out in this letter, with a high level design expected this summer, and ensuring our continued commitment to racial equality.

When outlining the MPS delivery of these Action Plan commitments, it is important to take account of London's demographics, and how crime, social deprivation, and wider societal disadvantage in areas such as health and education, affect Black Londoners differently to other ethnic groups. Data in your speech on crime sadly showed that while "22 per cent of London's youth population are Black, for homicide 62 per cent of victims under 25 and 65 per cent of offenders are Black Londoners." This reflects our own age-focused review work, where we identified the peak for Black people entering police custody is around 15 years old, but for White people when in their 30s.

Life chances and opportunities for all Black Londoners, in particular young Londoners, need to be improved holistically by all statutory and non-statutory partners and by society and communities as a whole. Your December 2021 report, 'Understanding serious violence among young people in London', highlighted that deprivation including access to food is associated with offending levels.⁶ Public Health England⁷ data showed that infant mortality rates for both Black African and Black Caribbean babies were over twice that of those from a White British ethnic group. University of Oxford⁸ data on maternal death for Black women showed a rate of 31.61/1000 maternities, over

⁵ https://www.london.gov.uk/press-releases/mayoral/mayors-speech-on-crime

⁶ 'Rates of offending are strongly associated with different measures of deprivation and poverty, including areas where people are most likely to struggle to access food. Statistical modelling found absence rates from secondary school were a significant factor in predicting Boroughs with highest rates of serious violence.'

⁷ https://www.gov.uk/government/publications/health-inequalities-reducing-ethnic-inequalities

⁸ https://www.npeu.ox.ac.uk/mbrrace-uk/reports



twice the rate for the next group of Mixed ethnicity and for White women, only 7.04/1000 maternities. As you have set out in your letter, collaboration across all of those who are able to change these stark statistics is critical for Black Londoners. We must all do more and do more together.

I am pleased this exchange of letters will be published. I welcome this transparent approach as an opportunity to highlight the progress we have made on these important matters, alongside setting out the context in which we work and the importance of collaboration between all partners and communities. This complements our regular MPS/MOPAC oversight meetings and the public meetings, delivered jointly, since the publication of the Action Plan in 2020. We have of course discussed this work during our bilateral meetings, and also separately with the Deputy Mayor and other colleagues in City Hall and MOPAC.

We remain as ever open to feedback and willing to learn, as we work hard to make the Met the best service we can be, keeping London safe for everyone.

Sir Stephen House Acting Commissioner



Annex A - MPS Responses to Mayor's Action Plan commitments 9

Action 1 - 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.

MPS response – The MPS has completed this pilot and shared the report with MOPAC. The MPS is finalising the report in light of MOPAC feedback. The MPS is aware that other forces nationally are considering similar pilots, and where appropriate the MPS will consider any outputs from those pilots. The National Police Chiefs' Council and College of Policing have been considering similar work as part of their development of the forthcoming NPCC and College Race Action Plan. The MPS will consider next steps in line with the Plan when published.

Action 2 - A 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.

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

MPS response – A new handcuffing policy was launched on 18th November 2021. It is supported by the refreshed Public and Personal Safety Training (PPST) programme, which extends training contact time for all officers and is outlined in detail below under Action 13. Sitting alongside this training programme is a mandatory digital package for all officers up to and including Superintendent, which enhances officers' learning around the key aspects of handcuffing policy and law.

To assess its impact the MPS has established a review process to be carried out over the next 12 months. This will consider any changes in the use of pre-arrest handcuffs following the launch of the policy, which current indications show has fallen, capturing in addition, any differences in the use of other forms of force. This review will be assisted by the agreed improvements under development in the process for recording of use of force, notably in relation to stop and search.

⁹ Action reference numbers are MPS internal references and action wording is taken directly from the Mayor's Action Plan.



<u>Action 3</u> - 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.

MPS response – A joint MPS and Haringey Children's Services report was prepared in March 2021. A key recommendation from the initial report was for the pilot to continue. Therefore, in October 2021, its development was explored in a workshop at one of MOPAC's Mayor's Action Plan public meetings. Young people's viewpoints were captured about opportunities to address their safeguarding needs and thereby inform improvements in the MPS and local authority response. A key improvement identified in this forum was the need to develop processes and protocols for providing 'Early Help Services' to young people and their families, informed by reporting and engagement from both police and Children's Services.

Phase 2 was initiated in Autumn 2021 with an increased focus on Haringey violence hotspots and this work continues. Police oversight and governance of this work is delivered locally through North Area BCU and reported to MPS leads for public protection and stop and search.

<u>Action 4</u> - The MPS will 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.

<u>MPS response</u> – Significant changes have been made in the management of Safer Schools Officers, building on the high levels of trust the public, notably the Black community, have in them. This has included a full Equality Impact Assessment and a bespoke Safer Schools Officer Handbook.

A Deputy Commissioner's Delivery Group (DCDG) review of the work of Safer Schools Officer has been completed, with its findings being subject to review through the DCDG Steering Group. Wider discussion and consultation on the role of Safer Schools Officers took place within the MOPAC Mayor's Action Plan public meeting in January 2022, capturing specifically the viewpoints of young people, parents and teachers. A further report is due to be presented internally shortly and the MPS intends to share this with MOPAC in the near future.

Action 5 - MOPAC and the MPS have committed to work with communities to review of 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.

<u>MPS response</u> – The MPS have undertaken a significant review of community engagement and from its results, developed an action plan, which is being addressed by each BCU through their Neighbourhood Policing leads.

In February 2022, all Neighbourhood Policing Leads undertook a day of reflection to share best practice, notably in relation to the positive work ongoing in Croydon, and build on their good work, to ensure their communication plans maximise opportunities to engage with the Black community living, working and socialising in their BCUs.



The development of Police Encounter Panels (PEPs), where a wider range of policing encounters can be reviewed by the public, has focused on recruitment from both minority ethnic groups and young people, who historically have been less well represented in similar panels. We launched PEPs in March 2022.

Action 6 - The MPS will 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.

MPS response – The Handbook of Engagement is shortly to be available on the MPS website. Its format outlines MPS structures and opportunities for being involved in the MPS; from being a Volunteer Police Cadet to being a member of an Independent Advisory Group.

Action 7 - 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.

MPS response – Up to December 2021 the MPS has achieved these challenging aims with 16.2% of its overall officer representation being from under-represented ethnic groups (5370 of 33,077 officers). During 2021/2022 23% of our recruits were from under-represented ethnic groups, and 4.4% were from a Black background. To maintain this position, the MPS is monitoring closely the recruitment pipeline and where appropriate, is utilising the principles of Equal Merit to improve diversity.

An important consideration in assessing this action, is the buoyancy of the wider employment market in London. The MPS is responding to this challenge, which includes delivering specific media campaigns, focused on highlighting our commitment to recruiting a workforce reflective of London and ensuring the changes noted in Action 8, related to the MPS recruitment process, eliminates disproportionality. Due to its critical significance to the MPS, recruitment is monitored on a weekly basis.

Action 8 - The MPS will set specific aims for the recruitment and promotion of black officers.

MPS response – The MPS set an aim for recruitment of Black officers as 8% of all recruits. For promotion, aims were set for Black, Asian and Multiple Ethnic officers: 15% of Sergeants and 14% of Inspectors by the end of 2023/2024 and specifically for Black officers the aim set was: 3% of Sergeants and 3% of Inspectors. In December 2021 recruitment of Black officers was 5.5%, 10% of Sergeants were from a Black, Asian and Multiple Ethnic heritage and 2.6% were Black. For Inspectors, 11.4% were from a Black, Asian and Multiple Ethnic heritage and 2.6% were Black.

To address unexplained disproportionality in recruitment the MPS continues to work with the College of Policing to develop an improved assessment process. To ensure MPS selection is in line with our values and what is required to be a police officer in London, key relevant criteria have been developed and we have increased training for assessors, including a clear focus on understanding and assessing MPS values and individual unconscious bias. This is being built on with community consultation on thoseht key requirements to be a police officer.



To improve the promotion position the MPS is developing specific programmes to support the promotion of Black officers. This includes the 'Inspiring Leaders' programme, specifically designed to support Black constables and 'Lead On' for all under-represented supervisors up to and including Chief Inspectors.

Action 9 - 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.

MPS response – The MPS introduced the London residency criteria in November 2020 alongside bespoke Outreach Teams, aimed at recruiting under-represented minority ethnic Londoners to consider a career in the MPS. However, the MPS has paused this approach for a short time to ensure that the MPS is able to achieve the overall recruitment levels required, recognising the current recruitment landscape. The MPS has maintained the commitment and investment in the Outreach Teams to maintain diversity recruitment levels.

<u>Action 10</u> - 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 (CRG) will be established to facilitate this.

<u>MPS response</u> – The Learning and Development Community Reference Group is fully established, with a regular meeting schedule in place. Many members work, or have professional links, within education and training and have been invaluable in providing advice on the development of many areas of the MPS response to the learning and development of staff. MOPAC are invited as observers and both the College of Policing and National Police Chiefs' Council colleagues have attended to encourage national consideration around the replication of this approach for other forces.

Action 11 - 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.

MPS response —This in-person pilot was expected to be complete in December 2021, however timelines have had to be extended into 2022, albeit it is expected to be completed shortly. Following its conclusion a review will be undertaken by Central South BCU and the Learning and Development Command. Contact has already been established with the MOPAC Evidence and Insight Unit in order that they can support the review and in particular help provide an objective basis for a decision as to whether the programme should be extended to other BCUs.

Action 12 - 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 facilitated through the introduction of a local Community Immersion Project and a new BCU Familiarisation Week.



MPS response – This learning is now entitled the 'Community Impact Task'. It is delivered after the first 11 weeks of training and is to prepare recruits for their operational time on a BCU. Recruits meet (where available) Independent Advisory Group chairs, local mayors and then visit community projects, archives or groups, learning about key critical events on the BCU (all activity is tailored for local BCU delivery) to enhance their awareness of the community on the BCU and raise confidence in policing, due to a clear appreciation of its history and seeing policing activity from others' viewpoints. This complements familiarisation with the BCU as a whole (eg custody suites/bases etc) and towards the end of the week also incorporates a meeting with the Neighbourhood Policing lead, who reiterates the key aspects of the local community and their local priorities. The MPS knows from local IAG feedback that officers are developing enhanced knowledge of their communities, including different faith groups and the local structures supporting the MPS with support and advice.

Action 13 - The safety training that new recruits receive will be enhanced with an extra 3 days centred on how the MPS equip recruits with additional skills to deal with and de-escalate potential conflict situations to improve the safety of the public and the officers serving them.

MPS response – The 8 day timetable provides additional time for student constables to become competent and confident with skills being taught. Additionally, training that had previously been delivered during annual refresher courses, has now been brought into the student constable timetable. The extra 3 days provides more opportunity to link skills together, rather than practise them in isolation. This translates into more role-play (being both the officer and the member of the pubic being searched) and scenario practice sessions, and will include areas such as searching, handcuffing and edged weapon defence. Further inputs on Acute Behavioural Disturbance, along with dealing with people experiencing mental health crises, have also been added. An enhanced lesson that highlights the use of tactical communication, and how it links in with stress and deescalation, is also included. The effectiveness of this new programme will be considered prior to the launch of cycle 2 of training, which is due to start shortly.

Action 14 - 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.

<u>MPS response</u> – During initial training new recruits receive inputs in relation to cultural awareness, with the concepts of procedural justice and policing by consent, woven throughout their wider training programme. As noted above in response to Action 12, this includes the Community Impact Task, as noted in Action 13, within the enhanced Public and Personal Safety Training role-play and scenario training, and as outlined below in Action 15, the development of the Cultural Awareness Portal.

As part of a recruits 'Passing Out Parade' week (at the end of their initial training) a further programme has been established to ensure that officers appreciate the impact of policing on Londoners, notably on Black communities. Members of the Black community share their experiences of policing including stop and search, through sharing the history of police/Black community relations, contextualising their own personal experiences as part of the wider Black community experience.

Training in relation to stop and search has been developed to include both digital and in-person training. Where possible, the concept of viewing the Black community's experiences, through



'trading places' with a person being stopped and searched is utilised. The pilot on Central South BCU has specifically included this approach. The new MPS 'Just Another Day' stop and search/use of force digital training package is an interactive tool to ensure all officers up to and including Superintendents, reflect on their decision making within policing encounters (also noted above in Action 2).

Furthermore, to maintain the focus on the 'trading places' technique in MPS training, the Learning and Development Command have invested in a full time role to develop further and maximise opportunities for Black community voices to be heard. The potential inclusion of the community in the PPST programme is underway, noting that to deliver this requires considerable community availability due to the volume of PPST courses run daily across the MPS.

<u>Action 15</u> - 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.

<u>MPS response</u> – This commission has resulted in the development of an in-house 'Cultural Awareness Portal', where all members of the MPS will be able to access relevant information about London's communities and thereby appreciate how understanding communities and difference, underpins fair policing principles and the concept of Procedural Justice.

The portal includes bespoke briefings about BCUs, including their history, community groups and key characteristics, aimed at ensuring all those policing have the information to be culturally competent. Further content focuses on the wider MPS, including explanations of key events in policing London as well as timelines for relevant minority groups in London.

The portal is being launched shortly and as it evolves it is expected to capture the heritage stories of our diverse staff, celebrating their difference and illustrating how the MPS represents London's diversity.

Action 16 - 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.

<u>MPS response</u> – This funding has been utilised to deliver 14 senior leaders as Career Development Officers, trained specifically in supporting under-represented officers achieve their potential. They are located across all BCUs and within specialisms to support the MPS retention, promotion and selection aims outlined within this annex. They will be a key part of the new leadership programmes for Black constables and under-represented leaders noted above in relation to Action 8.



Action 17 - The MPS is committed to significantly reducing 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.

MPS response – The MPS has undertaken significant work to reduce disproportionality in both misconduct and grievance procedures. For misconduct, a process of checks and balances remains, under the leadership of Commander Savell within Professional Standards. This is added to with a pilot initiated in late 2021 on 4 BCUs, to support more developmental conversations, thereby positively shaping officer and staff performance to reduce referrals into the misconduct process; this being where disproportionality is particularly noted. Early indications are that already this is supporting supervisors in addressing minor development needs proportionately and minimising lower level misconduct referrals. Full implementation across the MPS took place in early February 2022.

Reviews of grievances continues under the leadership of MPS Director of HR, Clare Davies. Grievance numbers remain static, with an average of 245 per annum over the last three years. However under-represented ethnic officers/staff are still 1.7 times more likely to raise a grievance. Reviews of these show a believed lack of career support and training and perceptions of inappropriate early use of misconduct processes, and by default failure to use a more informal developmental approach, as significant factors.

To continue the upward trajectory in the use of mediation (increased by 50% in 2020/2021), the MPS includes conflict resolution training on sergeant and inspector promotion courses, as well as extending training on grievance management to a further 500 leaders. Grievance Management Team support is offered to senior leadership teams identified as grievance 'hotspots' to develop, where appropriate, their response to all staff.

The links between misconduct, grievances and employment tribunal claims are being considered through a joint working group of HR and Professional Standards leads, ensuring a co-ordinated response across the MPS.

Action 18 - 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.

MPS response – Operation Hampshire principles now include hate crime as well as physical assault. Guidance is available on the MPS internal Intranet, which includes the expectations set for senior leaders when supporting staff. The Operation Hampshire performance dashboard is fully established, with the central Operation Hampshire team capturing good practice to enhance support for all officers and staff affected.

<u>Action 19</u> - The MPS has put in place the necessary safeguards and has reinstated Body Worn Video reviews by Community Monitoring Groups from October 2020.

<u>MPS response</u> – From September 2020, Community Monitoring Groups have been able to view Body Worn Video in line with their terms of reference for reviewing stop and search encounters.



Our central stop and search team collate feedback from local leads to ensure relevant organisational learning across the MPS.

<u>Action 20</u> - 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.

<u>MPS response</u> – The research has required considerable review and consultation to ensure compliance with relevant legislation, policy and practice. This has now been achieved and the research is underway. Results are expected to be available in summer 2022.

<u>Action 21</u> - 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.

MPS response – A Complainants' Survey was conducted in October 2020 with 300 responses received from a potential 1700 people invited to participate. 80% of those responding indicated that the service they received was poor or very poor, with the two main aims, when making their complaint, noted as organisational or individual learning.

To address this feedback the MPS has established within the Directorate of Professional Standards (DPS), a Complaints Resolution Unit. This unit is already in place and is operating 7 days a week contacting complainants, identifying opportunities for early resolution of concerns where appropriate, through learning and reflective practice. Its aim is to provide a timely response and resolution to complaints and where necessary, feed in organisational learning through the Prevention and Learning function in DPS and support individual learning through local Professional Standards Units. Where necessary the CRU will initiate a proportionate misconduct investigation.

Each complainant will be provided a survey to complete (capturing demographic data), ensuring the MPS is able to assess the benefits of the CRU and identify drivers of complaints. The impact of these changes, alongside those outlined above in Action 17, will be monitored within the DPS led Disproportionality in Misconduct Working Group.

Action 22 - 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.

<u>MPS response</u> – The necessary changes to deliver stop and search records via email have been delivered. This allows those subject to stop and search to be provided with an email summarising the key information from their encounter. Demand for this service will be monitored to understand any benefits and opportunities for improvement within the new MPS CONNECT IT platform.



<u>Action 23</u> - 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.

MPS response – Data sharing protocols are in place between MOPAC, MPS and wider GLA.

Action 23a - MPS to sign up to voluntary code of practice in line with MOPAC & GLA ensuring the data is used to a consistent and high standard by all parties

<u>MPS response</u> – The MPS currently is reviewing carefully the impact of the voluntary code of practice and is working with the Open Data Institute to ensure a wide capture of viewpoints are considered and any necessary changes will be considered alongside national guidance

