

# MOPAC MPS Oversight Board

## 24 June 2022

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### Mayor's Action Plan Update

Report by: Commander Helen Harper on behalf of the Acting Commissioner

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#### 1. Purpose of this Paper

This paper reports on the progress the MPS has made in delivering the items listed within the Mayor's Action Plan. The Action Plan was published in November 2020 and in the subsequent 18 months, the MPS has delivered 21 of the 23 actions listed, with the remaining 2 on track or in progress.

#### 2. Recommendations – that the Oversight Board:

- a) Note the progress made by the MPS in delivering the Mayor's Action Plan
- b) Discuss any outstanding actions and progress being made to resolve these.

#### 3. Information for Consideration

- 3.1 The MPS has come a very long way over the last two decades, working with our many and diverse communities to build positive relationships, focus on what matters most to Londoners and recruit a workforce that reflects the city we serve.
- 3.2 We want all communities to have the same high levels of trust in us as we aim to become the most trusted police service in the world. Lower levels of trust create challenges for us in keeping Londoners safe, whether it is a reluctance to share information, to report crime, or to support our work to tackle violence.
- 3.3 With this in mind, we have worked closely with the Mayor and his team, in respect of Mayor's Action Plan, to further boost our work in this vital area
- 3.4 In a clear demonstration of the commitment we showed to delivering the plan, the-then Deputy Commissioner set up a Delivery Group (DCDG) to put focus

and energy into the work. And we continue to work in partnership - the Met, with City Hall, MOPAC, and our partners and communities in London – to contribute to our progress on improving the confidence of London’s Black community. The DCDG will continue its work, and has now been merged into the CPIE team to complement the wider work on community engagement. The good work to improve relations amongst London’s Black communities will continue.

- 3.5 This work has taken place alongside a new Strategy for Inclusion, Diversity and Engagement (STRIDE), launched in September 2021. The STRIDE strategy 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.
- 3.6 STRIDE is an organisational priority for the Met and supports the objectives in the Mayor’s Action Plan. We will soon be publishing an updated STRIDE Action Plan for 2022-23.
- 3.7 In addition, the NPCC Race Action Plan was launched in late May. A key aim of that plan too is to improve Policing for Black people. We have reviewed the plan and as part of the new Stride Action plan 2022/23 we are ensuring that it incorporates specific actions and commitments to support the National plan.
- 3.8 Annex A of this report sets out our response on each specific Mayoral 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.
- 3.9 It is helpful for the MPS to see the data in MOPAC’s published Action Plan dashboard<sup>1</sup> 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 44% of Black respondents trust the Met, 37% believe the Met treats people fairly, 37% feel the Met does a good job locally, 53% that the Met can be relied upon, 48% that the Met listens to concerns, 46% support the use of stop and search, and 85% support Safer Schools Officers in schools. We note that these figures have declined in the most recent quarter and we of course want trust to be higher and we are working hard to increase it.
- 3.10 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

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/policing/action-plan-dashboard>

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.

- 3.11 There are **23 actions generated by the MAP and over 110 MPS actions**. As noted, in the accompanying DCDG Highlight Report, only **2 of the MAP actions remain outstanding**. The misconduct and grievance action was not expected to be completed prior to 2024, so remains on track and the other action, associated with S&S BWV joint coding by the MPS/MOPAC, is due to be shared in summer 2022. The **MPS generated actions are completed in the majority of cases** and where not, are being transferred to CPIE oversight or recommended for inclusion in the new **STRIDE Action Plan 2022/2023**.
- 3.12 The outstanding actions have been incorporated into Stride plan for 2022/23 which is in the final draft.

## Annex A – MPS Responses to Mayor’s Action Plan commitments <sup>2</sup>

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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. In addition the National Police Chiefs Council and the College of Policing have been considering similar work as part of their development of the NPCC and College Race Action Plan. The Race Action Plan (RAP) is being adopted into the MPS 2022-2023 Stride Action Plan. The RAP calls for all forces to record the ethnicity of those involved in road traffic stops. This will progressed in the MPS and we are currently working to ensure that an efficient and proportionate process is designed to capture this data in line with other forces.

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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 18<sup>th</sup> 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.

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<sup>2</sup> Action reference numbers are MPS internal references and action wording is taken directly from the Mayor’s Action Plan.

Action 3 - 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.

This project is now in its final phase and all results will be evaluated in August 2022.

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Action 4 - 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.

MPS response – 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.

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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.

MPS response – 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.

The first review will be held in June 2022 to capture MPS learning and share best practice.

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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.

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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.

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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 those 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.

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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.

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Action 10 - 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.

MPS response – 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.

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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.

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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.

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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 public 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 de-escalation, 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.

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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.

MPS response – 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.

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Action 15 - 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.

MPS response – 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.

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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.

MPS response – 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.

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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.

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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.

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

MPS response – 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.

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Action 20 - 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.

MPS response – 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.

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Action 21 - 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.

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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.

MPS response – 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.

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Action 23 - 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.

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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

MPS response – 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 Assessing impact