

# Action Plan - Transparency, Accountability and Trust in Policing

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

London skyline over the thames

## Key information

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## **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 levels 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.

## 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. Lord 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 Report 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.

## **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, YouthZone, Lifeline Projects, Ligali, The London Assembly, London Councils, Mentivity, Merton Stop and Search Community Monitoring Group, the Metropolitan Police Service (MPS), the MPS Black Police Association, the MPS Race IAG, the 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

# 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 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.
- 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 3 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.

## **1. 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.

## **1.1 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.

## **1.2 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.

## **1.3 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.

## **1.4 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.

## **2. 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.

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.

## **2.1 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, 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.

## **2.2 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.

## **2.3 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 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.

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.

### **3. 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.

### **3.1 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 22/23. 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.

### **3.2 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.

### **3.3 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.

### **3.4 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.

### **3.5 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.

## **4. 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.

### **4.1 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.

## **4.2 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.

## **4.3 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.

## **4.4 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 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.

## **4.5 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.

## **4.6 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.

#### **4.7 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.

#### **4.8 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.

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.

## **4.9 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.

## **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.

## **The Mayor, the MPS and GLA**

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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