

MDA No.: 1648

Title: Public Order Policing – The Met’s Approach

1. Executive Summary

- 1.1 At the Police and Crime Committee meetings on 9 October and 6 November 2024 the Committee resolved that:

Authority be delegated to the Chairman, in consultation with party Group Lead Members, to agree any output arising from the discussion.

- 1.2 Following consultation with party Group Lead Members, the Chairman agreed the Committee’s report, *Public Order Policing – the Met’s approach*, as attached at **Appendix 1**.

2. Decision

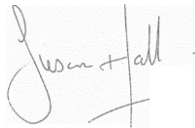
- 2.1 **That the Chairman, in consultation with party Group Lead Members, agrees the Committee’s report, *Public Order Policing – the Met’s approach*, as attached at Appendix 1.**

Assembly Member

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Printed Name: Susan Hall AM, Chairman of the Police and Crime Committee

Date: 17 April 2025

3. Decision by an Assembly Member under Delegated Authority

Background and proposed next steps:

- 3.1 The terms of reference for this investigation were agreed by the Chairman, in consultation with relevant party Lead Group Members, on 31 July 2024 under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the report and its recommendations fall within these terms of reference.
- 3.2 The exercise of delegated authority approving the report will be formally noted at the Police and Crime Committee's next appropriate meeting.

Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): L J Harvey

Printed Name: Lauren Harvey, Principal Committee Manager

Date: 15 April 2025

Financial Implications: NOT REQUIRED

Note: Finance comments and signature are required only where there are financial implications arising or the potential for financial implications.

Signature (Finance): Not Required

Printed Name:

Date:

Legal Implications:

The Chairman of the Police and Crime Committee has the power to make the decision set out in this report.

Signature (Legal):



Printed Name: Rebecca Arnold, Deputy Monitoring Officer

Date: 22 April 2025

Email: Rebecca.arnold@london.gov.uk

Supporting Detail / List of Consultees:

- Gareth Roberts AM (Deputy Chair)
- Len Duvall AM
- Zoë Garbett AM

4. Public Access to Information

- 4.1 Information in this form (Part 1) is subject to the FoIA, or the EIR and will be made available on the GLA Website, usually within one working day of approval.
- 4.2 If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.
- 4.3 **Note:** this form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral:

Is the publication of Part 1 of this approval to be deferred? **NO**

If yes, until what date:

Part 2 – Sensitive Information:

Only the facts or advice that would be exempt from disclosure under FoIA or EIR should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? **NO**

Lead Officer / Author


Signature: J Roker

Printed Name: Janette Roker

Job Title: Senior Policy Adviser

Date: 15 April 2025

Countersigned by Executive Director:

Signature: 

Printed Name: Helen Ewen

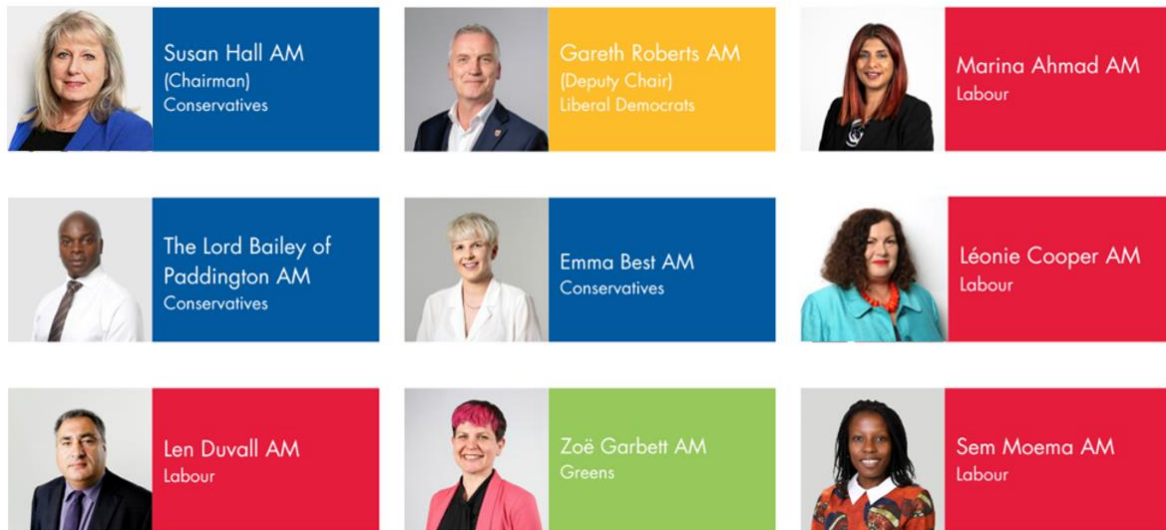
Date: 15 April 2025

Public order policing – the Met's approach

Police and Crime Committee

LONDONASSEMBLY

Police and Crime Committee



The London Assembly Police and Crime Committee is responsible for examining the work of the Mayor and his Office for Policing and Crime (MOPAC), to make sure that he is delivering on his promises to Londoners. It also investigates other issues relating to policing and crime in the capital, and routinely publishes the findings and recommendations from its investigations.

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Foreword



Susan Hall AM
Chairman of the Police and Crime Committee

The demands on the Metropolitan Police Service in relation to public order have skyrocketed since October 2023, with largescale demonstrations becoming almost a weekly norm. The impact of this has been highly visible on Central London, with consequences for residents, tourists, businesses and police officers alike. Between October 2023 and December 2024 Operation Brocks cost the Met £33,856,000¹ with 414 arrests.²

Within this report the Police and Crime Committee (PCC) highlights that the expansion of police duties in keeping the public safe and effectively managing the increased demand on police resources is essential. The committee makes a number of important recommendations to the Mayor, MOPAC, the Met and the Government to improve public order policing and the safety of Londoners.

This report has been agreed by the Committee at a time when increased demands on public order resources are against a context of reduced spending in the Met. Through its investigation, the Committee set out to explore the current demands on the police in relation to largescale public demonstrations that have developed more recently, as well as the traditional requirements of policing in relation to public order such as football policing and the Notting Hill Carnival.

In light of these increased demands on public order policing, the Committee recommends that the Government should further increase the National and International Capital City (NICC) Grant for the Met and ensure it is annually uprated to cover increased costs. MOPAC should also undertake analysis into how the NICC grant is used within the next 6 months to better calculate the unique demands of policing protests in London.

In terms of more traditional requirements of public order policing, amongst other measures, the Committee has recommended that the Mayor must commission a review of crowd density and crowd safety at Notting Hill Carnival to inform stewarding requirements. For such a large, high

¹ Data taken from Op Brocks cost and resource data from [October 2023 – December 2023](#), [January – March 2024](#), [April – June 2024](#), [July to September 2024](#), [October 2024 to December 2024](#)

² Arrest data is published by the Met, and can be found in the following datasets: [October 2023 – December 2023](#); [January – March 2024](#); [April – June 2024](#); [July – September 2024](#); [October – December 2024](#)

profile event where there are safety concerns for millions of Londoners, this would have a positive impact on the success of the event.

In addition to the difficult financial context and increased demands, two years on from the Baroness Casey review, the Met is still working to resolve the substantial challenges which have damaged public trust and confidence in the police. Public confidence in particular has hit an all-time low, with figures from June 2019 to the most recently available data in December 2024 showing a decline from 59% to 46%.³ The Committee found that the high-profile nature of public order policing can greatly impact areas such as officer morale, budgetary constraints and abstractions impacting the effectiveness on other areas of policing such as neighbourhood policing. The 12 recommendations made by the Committee therefore also aim to help improve public trust and confidence in the police in relation to public order and improve the effectiveness and reduce the cost of public order policing.

Throughout our investigation we spoke with a number witnesses who provided evidence and insight. We would like to thank them for generously giving up their time to support the Committee’s work.

Increasing demands on public order policing in London has become one of the most substantial and pressing challenges in keeping Londoners safe in recent years, and it is our hope that the recommendations of this report are taken forward to for the benefit of all Londoners and those tasked with keeping us safe.

³ MOPAC, [Public Perceptions Dashboard](#), accessed 25 February 2025. Data available by filtering measure ‘Confidence “good job” local’.

Executive Summary

The Metropolitan Police (the Met) has significant responsibilities around public order safety in London. This covers a wide range of public events and operations “where there is a reasonably foreseeable risk to public order and/or public safety”.⁴ It includes protests, festivals, sporting events, one-off and regular events, such as the King’s coronation and the Notting Hill Carnival. The Met has operational responsibility, as well as operational independence, for policing these events. It is a complex and diverse area of policing, and has been described as “the brain surgery of policing”.⁵

This public order demand has increased since October 2023, with greater protest activity related to the conflict in Gaza. The heightened demands being placed on the Met are occurring at the same time as reduced spending levels in the Met, and reduced staffing and officer numbers. New legislation has also altered the legal landscape around the policing of protest, causing significant debate about the balance between the right to protest and the rights of the wider public.

In September 2024, the London Assembly Police and Crime Committee launched an investigation into public order policing in London. The investigation aimed to examine:

- The state of public order policing in London in the wake of increased protest activity related to the Israel/Gaza conflict, as well as new legislation and powers.
- How increased public order pressure impacts the Met as a whole, including local neighbourhood teams, impact on officer wellbeing, and financial impact on Met budgets and resources.
- How the Met meets the challenge of national public order policing while also protecting the democratic right to protest.

In order to gain an understanding of public order policing and the demands on the Met, the Committee looked at three specific examples of public order work. These were chosen as major examples of public order policing in London, all three of which require dedicated and largescale Met operations. These areas were:

- Protests related to the conflict in Gaza
- Notting Hill Carnival
- The policing of football

The Committee held its first meeting on 9 October 2024. The meeting explored the increase in protest activity since October 2023, wider public order policing challenges, and legislation and the balancing of rights. The Committee’s second meeting took place on 6 November 2024 and focussed on the impact of increased public order demand on the Met and use of legislation.

The Committee also ran a survey to gather the wider experience of Londoners around public

⁴ College of Policing, [Public order public safety](#), 23 October 2013

⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.2

order policing. The survey was open for responses between Monday 2 September 2024 and Friday 22 November 2024. 38 responses to the survey were received.

Over the course of its investigation, the Committee heard that the Met has experienced an increase in public order demand and protest activity in the last year. The findings of the Committee’s investigation are set out in detail in this report, and include the following:

- The Committee heard that, overall, the Met is largely effective in its public order work. This includes facilitating the right to protest. Officers deserve credit for this, particularly in the context of intense public scrutiny and coverage on social media.
- Increased public order demand is putting the Met under strain, and this has not been matched with an increase in funding from the Government. The increase that the Government did announce in December 2024 (in the form of an increased National and International Capital Cities grant) does not go far enough towards bridging the financial shortfall.
- The Met continues to rely on ‘abstraction’, where local officers are taken away from regular duties at short notice to support public order operations in central London. Taking neighbourhood officers away from their regular duties is having a continuing impact on local policing services. This is mainly seen in relation to protest activity in central London, and officers being called-in at short notice.
- Officers who have undertaken specialist public order training are now stepping back from public order work in increasing numbers, due to the demand of regular weekend shifts and impact on family life.
- The Met continues to raise concerns about the risk of a crush scenario at Notting Hill Carnival, due to high crowd density and inadequate stewarding provision from the organisers. The Committee shares these concerns.
- New legislation around protests has altered the legal landscape around the policing of protest, including on what defines ‘serious disruption’. The Committee heard that this is creating a complex and often confusing landscape for both police and protesters, causing debate around the balance between the right to protest and the desire of the wider public to avoid disruption. The Committee heard conflicting points of view on whether the Met manages to maintain this balance, reflecting the polarised nature of debate around much protest activity. Clarity and new guidance are required.

The Committee makes 11 recommendations, which are set out below.

Recommendations

Recommendation 1

The Government must ensure the National and International Capital City (NICC) Grant it provides to the Met is updated yearly in line with inflation and operational requirements.⁶

Recommendation 2

MOPAC should undertake analysis into how the NICC grant is used within the next 6 months, including how the grant could be better calculated to meet the unique demands of policing protest in London.

Recommendation 3

The Met must publish its Aid Reduction Plan, or a summary thereof, to provide reassurance to local communities concerned about the impact of abstractions on neighbourhood policing. This plan should include a medium to long-term strategy for reducing neighbourhood abstraction levels by 50 per cent within the next five years.

Recommendation 4

The Met should undertake internal survey work to ensure it fully understands why officers are handing in their public order tickets and what incentives would encourage them to continue public order work. The Met should also use the results to develop an action plan within the next 12 months to ensure targeted and tailored support to officers.

Recommendation 5

The Met should launch an internal campaign to encourage greater sign up to public order training at level 2. The Met should report back to the Committee within 12 months on what action has been taken to encourage greater take up of level 2 training and the results.

Recommendation 6

The Mayor and the Met should provide mental health support for officers who have undertaken extensive public order duties, particularly for those who are exposed to criticism and personal attack on social media.

⁶ Zoë Garbett AM dissents from Recommendation 1. She does not agree with the call to: “ensure the National and International Capital City (NICC) Grant it provides to the Met is updated yearly in line with inflation and operational requirements.” The Committee received written evidence from Network for Police Monitoring (Netpol) highlighting how: “abstraction from local neighbourhood police teams to deploy thousands of officers in central London for public order policing was a choice made by the Metropolitan Police Commissioner”. Assembly Member Garbett agrees that this is a choice made by the Met and believes that the response should not be to increase the Met’s funding, but instead to look at the choices made around how protest and other public order events are policed.

Recommendation 7

The Mayor must commission a review of crowd density and crowd safety at Notting Hill Carnival to inform stewarding requirements. This must include a full review of pinch points and strict guidance for the number of stewards required across the Carnival. The findings of this review should be made public at least three months in advance of Carnival 2026.

Recommendation 8

The Government should include the cost of policing football matches in the remit of the new Independent Football Regulator. The Government should review the policing of football matches so it is placed on a more sustainable footing, with more equitable contributions to matchday policing from the Premier League and Premier League clubs.

Recommendation 9

The Met should conduct an evaluation of its work on the ENABLE project by the end of December 2025. The Met should publish a summary of findings from this evaluation, including scoping whether lessons learnt from ENABLE could be used to reduce officer numbers required for wider public order policing.

Recommendation 10

The Government should issue clear public guidance on the status of the new threshold used for serious disruption following the conclusion of the legal appeal (National Council for Civil Liberties, R v Secretary of State for the Home Department [2024]).

Recommendation 11

The Met should issue comprehensive new guidance for the public within the next 12 months on how new protest policing powers will be used going forward, and how it will ensure the use of these powers doesn’t infringe upon protected rights to freedom of expression and assembly. This guidance should include specific sections on the use of Serious Disruption Prevention Orders and the use of stop and search in a protest context.

Protests in central London since October 2023

London has experienced an increase in public order demand and protest activity over the last couple of years. The Met has described this as the “greatest period of sustained pressure on the Met since the Olympics in 2012”.⁷ Several factors have created this increased pressure. These include, for example: an increase in regular large scale protest activity since the attacks in Israel on 7 October 2023 and the subsequent conflict in Gaza; environmental groups, such as Just Stop Oil, using tactics of direct action and disruption; and disorder following the violent attack in Southport in July 2024.

The regular protests in central London around the conflict in Gaza have presented a challenge to the Met. This is partly due to the highly polarised nature of the debate surrounding the conflict, meaning that the police are operating under an increased degree of scrutiny, particularly on social media.⁸ It is also partly due to the regular and largescale nature of these demonstrations, with many tens of thousands attending frequent marches.⁹ The Committee looked at how this was impacting the Met, and how the Met was responding to this extra demand.

Facilitating the right to protest and proportionality

The Met has a positive duty under human rights legislation to facilitate protests to take place, as long as they remain peaceful. This means it has a duty to refrain from preventing, hindering or applying unreasonable restrictions upon the right to peaceful assembly, as well as the duty to take reasonable measures to protect peaceful public processions and assemblies.¹⁰

The right to freedom of expression, and the right to freedom of assembly and association, are protected rights under Articles 10 and 11 respectively of the European Convention on Human Rights (ECHR),¹¹ enshrined in UK law by the Human Rights Act 1998. The police also have a duty under Section 6 of the Human Rights Act 1998 not to act in a way that is incompatible with ECHR rights.¹²

Throughout this investigation, the Committee heard that the concept of proportionality is vital in ensuring the Met facilitates peaceful protest. Proportionality in policing means ensuring the

⁷ House of Commons Home Affairs Committee, [Oral evidence: Policing of Protests](#), 12 December 2023

⁸ Louise Puddefoot, Commander in the Met, told the Committee on 6 November: “One of the things that is making in particular these demonstrations around [...] the Middle East conflict difficult is the media scrutiny and the fact that officers who are doing their best in policing a very difficult, complex geopolitical situation are then finding themselves going viral on social media for saying the wrong thing.”

⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.20

¹⁰ College of Policing, [Police Response to Protest Flow Charts](#)

¹¹ See [European Convention on Human Rights](#), p.12

¹² See [Human Rights Act 1998](#)

level of intervention is the least restrictive available to achieve a legitimate aim.¹³ Tom Southerden, Programme Director at Amnesty International, explained: “Protest is a right and [...] you have the right to do it unless interference with it can be justified [...] A] proportionate [response] is the minimum necessary to achieve the protection of the rights of others.”¹⁴

The Met’s Major Operations and Public Order Commander, Louise Puddefoot, told the Committee on 6 November:

“Often people do not realise that on a protest, we always want to do a graduated proportionate response. We will initially put as few police as possible out. Engagement is our best tactic. If we can engage and use neighbourhood policing style that is exactly what we want to do, but we often have a lot of officers metaphorically around the corner in case it does not go well. By having the time to assess the threat, risk and harm from these protests, we have realised that potentially we do not need as many reserves. It has been good in that sense.”¹⁵

An increasing level of regular largescale protest

Increased protest activity in central London began in the days following the start of the conflict in Gaza in October 2023. The first largescale march in central London took place on Saturday 14 October 2023, with tens of thousands of people in attendance. Fifteen arrests occurred at this protest,¹⁶ and eight police officers were injured.^{17 18}

Following this initial largescale protest, regular subsequent protests have been held most weekends in central London, ranging in size from several hundred to hundreds of thousands. Assistant Commissioner Matt Twist told the Committee on 11 September 2024:

“Over the span of the protest, we have seen the number of people attending reduced significantly to a fairly steady 10,000 or so. So, we were looking at 300,000 in November last year [2023] down to about 60,000. Now on every third weekend we are seeing about eight- to 10,000 would be our assessment.”¹⁹

Protests continue in 2025, albeit with decreased regularity and media coverage since the ceasefire announcement in January 2025.

¹³ College of Policing, [Public order public safety: Legal framework and legislation](#), 8 June 2023

¹⁴ London Assembly Police and Crime Committee [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.3

¹⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.8

¹⁶ The Guardian, [Tens of thousands of protesters across UK call for a free Palestine](#), 14 October 2023

¹⁷ Metropolitan Police, [Officer injuries at pro Palestinian protest 14/10/2023](#), November 2023

¹⁸ One officer was assaulted twice, leading to a total of nine assaults recorded.

¹⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

The Met’s response to increased protest activity

The Met’s response to the protests around the conflict in Gaza is conducted through Operation Brocks. In response to the protests, the Met has made use of Section 12 and Section 14 orders from the Public Order Act 1986. These allow the Met to impose certain conditions on the protests.

Section 12 Order

The order from the Public Order Act 1986 that allows the Met to impose conditions on public processions. Conditions usually relate to the time, place, and proposed route of the procession.²⁰

Section 14 Order

The order from the Public Order Act 1986 that allows the Met to impose conditions on static public assemblies, again usually relating to the time and location of the assembly.²¹

Assistant Commissioner Matt Twist told the Committee that the Met had imposed conditions on these protests to a “greater extent than at any other time in [...] the history of the Public Order Act, since 1986.”²² He also confirmed that the Met had “imposed preconditions on every one of these marches linked to the starting time, the place, the route, the assembly, the finish time and we have done so because it has been felt necessary”.²³ Assistant Commissioner Twist said:

“We saw early on, absent these conditions, groups will veer off and try to continue protesting later into the evening or go into the West End and what we have seen is where conditions have been used, that has not happened, and we have been able to enforce it.”²⁴

However, the Committee also received evidence from the campaign group Network for Police Monitoring (Netpol), who argued that the use of conditions was “wholly disproportionate” to “any realistic prospect of serious public disorder.”²⁵

²⁰ [Public Order Act 1986, Section 12](#)

²¹ [Public Order Act 1986, Section 14](#)

²² London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

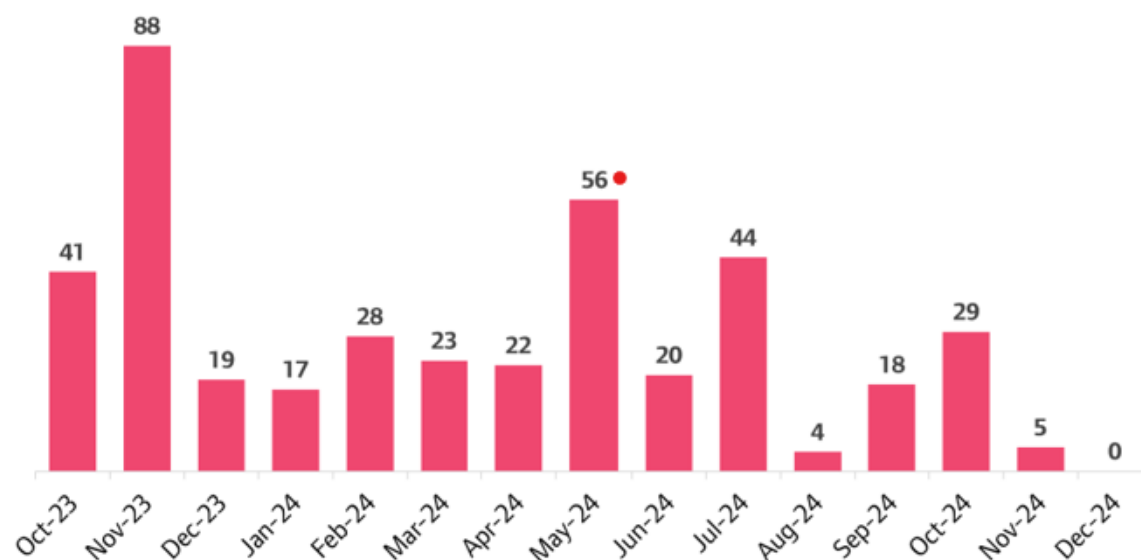
²³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

²⁴ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

²⁵ Written evidence submitted by Netpol (The Network for Police Monitoring), 4 September 2024

Arrest numbers have largely been low during these protests when considered in the context of the large numbers in attendance. However, there has been debate over whether these low arrest numbers are evidence of peaceful demonstrations or whether the Met should have made more arrests.

Arrest data for Operation Brocks



Source: Metropolitan Police²⁶

Some guests told the Committee that the Met has handled demonstrations well and the protests have taken place with little evidence of disorder, and therefore no need for arrests. For example, Matt Parr, former Inspector at His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), told us that:

“Public order is one of the things [the Met] does very well. I have spent a lot of time with their public order commanders and indeed officers on the front line, and I have done similar in other parts of the country. I would say the level of expertise and experience in policing in the Met is on a different level to most, if not all, other forces around the country, largely because they get so much practice and the demands on them are significantly greater than they are elsewhere.”²⁷

Geoff Pearson, Professor of Law at the University of Manchester, said:

“In terms of what has been done well, these events are allowed to take place. They generally take place without major disorder. That takes some doing. Some of these events

²⁶ Arrest data is published by the Met, and can be found in the following datasets: [October 2023 – December 2023](#); [January – March 2024](#); [April – June 2024](#); [July – September 2024](#); [October – December 2024](#)

²⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024

taking place, for example, in France, would not have passed off as peacefully as they have here. Public Order Commanders and advisers need to take a lot of credit for that.”²⁸

At the Gaza protests I've been to I have found the police to be fairly laidback because frankly they don't have much [to] do, these are not disorderly protests. I find the police quite polite. There was an incident where a counter protestor got into the group but the police controlled it sensibly.

Survey response

The Met has reported that, at some points in the earlier period of these protests, it did not act quickly enough, including making arrests earlier.²⁹ In response, it has subsequently put measures in place to ensure it acts more quickly in the future, including developing tactics to become “faster and more decisive”.³⁰

In comments initially made to the thinktank Policy Exchange,³¹ and then repeated to the Committee, Assistant Commissioner Matt Twist said the Met did not get everything right at the start of the protests. He told the Committee:

“When I look back at the policing of protests over the last eight months, we know that we did not get everything right, particularly in the early stages in October [2023]. We have developed tactics since then, becoming faster and more decisive.

On occasion, we did not move quickly enough to make arrests, for example, somebody who was chanting for jihad, which was a decision made in the fast time following advice from lawyers and the Crown Prosecution Service. We are now much more focused on identifying reasonable grounds for arrest, acting when needed, and then investigating. In circumstances such as those, it is much more likely we would make arrests now.”³²

However, the Committee heard that there were still instances where the Met were not acting quickly enough. Lord Walney told the Committee:

“Nevertheless, there are also incidents, and I think you can look at this last weekend [5 October 2024], where there were banners on display in clear support of a prescribed terrorist organisation, Hezbollah, committed to the violent eradication of Israel, which is in clear contravention to the law, which were not picked up at the time, and that goes into a

²⁸ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.2

²⁹ BBC News, [Met admits making mistakes on Palestine protests](#), 9 September 2024

³⁰ Policy Exchange, [Might is Right?: The ‘Right to Protest’ in a new era of disruption and confrontation](#), 9 September 2024

³¹ For Matt Twist’s original comments, see p.11-12 of: Policy Exchange, [Might is Right?: The ‘Right to Protest’ in a new era of disruption and confrontation](#), 9 September 2024

³² London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.14

question of policing tactics, where the police rightly point out that they have a responsibility to maintain public order and that in some circumstances you will have that action, which they might otherwise want to take, may result in a hostile situation being exacerbated. I can understand the line of that argument, but it does create an issue where some of these clear offences are not being immediately brought to justice in the way that we would all like to see.”³³

On 18 January 2025, the Met arrested 77 protestors during a Palestine Solidarity Campaign (PSC) protest. The Met has stated that, despite ongoing discussions with PSC in the weeks before the protest, and agreement to the conditions, it “saw a coordinated effort to breach Public Order Act conditions and cause serious disruption to Londoners”. It reported that it witnessed “the most significant escalation in criminality” and made the “highest number of arrests” since the protests began in October 2023.³⁴ Protesters have disputed the Met’s account³⁵, and the policing has been described as “repressive and heavy-handed”³⁶. Calls have been made for the Home Secretary to establish an independent inquiry into the Met’s handling of this protest. A review of the legislation limiting protests has also been requested.³⁷

The Committee welcomes the Met’s commitment to monitor and reflect on its response to the policing of protest and urges it to continue to take a proportional and measured approach to protest policing, acting if offences are committed, but remaining mindful of its duty to facilitate peaceful procession and assembly.

³³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.4

³⁴ Metropolitan Police, [More than 70 arrested at Palestine Solidarity Campaign protest](#), 18 January 2025

³⁵ BBC News, [Corbyn and McDonnell face police interview after pro-Palestinian rally](#), 19 January 2025

³⁶ The Guardian, [Pressure grows on the Met over ‘heavy handed’ policing of pro-Gaza protest](#), 31 January 2025

³⁷ The Guardian, [Pressure grows on the Met over ‘heavy handed’ policing of pro-Gaza protest](#), 31 January 2025

Financial impact of increased public order demand

In order for the Met to properly facilitate the right to protest in a proportional way, as well as to act quickly when interventions are necessary, it must be properly funded and resourced.

However, concerns have been raised about the impact of the increased public order demand on the Met. In February 2024, the Home Affairs Committee reported that protests were placing an “unsustainable pressure on policing resources”³⁸ and Commander Louise Puddefoot told us that, while the Home Office reimburses the Met for some of the money for protests, there is a deficit.³⁹

Cost of ‘Operation Brocks’

Costs associated with Operations Brocks are published by the Met on a monthly basis.

Cost of Operation Brocks

Month	Opportunity staffing cost (£000s)	Overtime cost (£000s)	Total cost (£000s)
9 October – 31 November 2023	9,492	4,393	Not available
December 2023	3,754	1,081	Not available
January 2024	3,379	640	4,777
February 2024	3,102	507	4,265
March 2024	2,773	598	4,422
April 2024	2,346	509	3,019
May 2024	2,015	549	2,671
June 2024	1,583	225	1,835
July 2024	1,524	233	1,768
August 2024	1,827	395	2,258
September 2024	2,035	193	2,269
October 2024	1,469	254	1,768
November 2024	2,587	314	2,960
December 2024	1,672	147	1,844
Total	39,558	10,038	33,856

Source: Metropolitan Police⁴⁰

³⁸ HASC, [Protests causing unsustainable pressure on policing resources](#), 27 February 2024

³⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.6

⁴⁰ Data taken from Op Brocks cost and resource data from [October 2023 – December 2023](#), [January – March 2024](#), [April – June 2024](#), [July to September 2024](#), [October 2024 to December 2024](#)

The Met has received additional funding from the Home Office related to Operation Brocks. In 2023/24 this was £16.2 million.⁴¹ Commander Louise Puddefoot told the Committee that the estimated 63,000 officer shifts required for Operation Brocks equated to “opportunity costs of £46 million.”⁴² Opportunity costs in policing refer to the estimated salary (excluding overtime) of officers and staff that were taken away from their regular duties to police a specific event, such as a protest in central London.⁴³ This opportunity cost has impacts on other areas of police work outside protest policing. The Commissioner has been reported as saying he “believes resources would be better used to combat phone snatches and violent crime” and to investigate “crime, robberies, burglaries and chasing down wanted offenders”.⁴⁴ Theft offences have risen in London by 11.9 per cent in the last year. Specifically, shoplifting offences have increased by 54.1 per cent, and theft from person offences have increased 35.3 per cent. Robbery of business property has also increased 70 per cent in the same time period.⁴⁵ Mobile phone theft has also reached record levels in London.⁴⁶

The National and International Capital Cities Grant

The National and International Capital Cities (NICC) Grant is a fund from central Government provided to the Met and the City of London Police in recognition of the unique demands of policing a major global capital city. For 2024/25, the NICC grant was worth £185 million to the Met.⁴⁷

The Commissioner of the Met, Sir Mark Rowley, the Mayor of London, Sir Sadiq Khan, and the London Assembly have argued that the NICC grant underfunds the Met.^{48 49} Commander Louise Puddefoot, told the Committee:

“There is a big deficit. The [NICC] grant funding is designed for the unique pressures of policing the capital city, and the grant has not been increased since 2019/20. We think now, taking into account the inflation, there is a gap of £240 million in that fund.

⁴¹ Written evidence received from the Met

⁴² London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.1

⁴³ Metropolitan Police, [FOI Request: Overtime bill for policing the Notting Hill Carnival in 2022](#)

⁴⁴ The Standard, [Met Police spends over £53 million on pro-Palestine protests ‘instead of fighting crime’ in London](#), 5 February 2025

⁴⁵ All figures taken from: Metropolitan Police, [Overview of crimes dashboard](#)

⁴⁶ The Times, [Mobile phone theft reaches highest recorded level in London](#), 10 March 2025

⁴⁷ Home Office, [Police grant report \(England and Wales\) 2024 to 2025 \(accessible\)](#), 31 January 2024

⁴⁸ For the Commissioner’s comments on the NICC grant, see: Metropolitan Police, [John Harris Memorial Lecture 2024 – a speech by Cmsr Sir Mark Rowley and Dep Cmsr Dame Lynne Owens](#), 19 September 2024; for the Mayor’s comments see: BBC News, [Met ‘underfunded for London’s unique demands’](#), 10 December 2023

⁴⁹ Assembly comments on NICC grant were included at the Police and Crime Committee meeting on 6 November 2024, for example see: London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.6 and p.7 and London Assembly, [Motion – Special Grant Funding](#), 5 March 2020

The cost of policing protests is significant. Mobilising all these officers costs a lot of money, and all the other things that I have already mentioned. The Home Office does reimburse us some of the money for the protests, but there is a deficit.”⁵⁰

Calls for an increase to the NICC grant go back to at least 2015. In 2015, MOPAC made a bid for an increased level from funding from central Government, in light of wider cuts to policing budgets outside of the NICC, placing greater pressure on the NICC itself.⁵¹

The Mayor has also called for increased NICC funding. The Mayor’s 2024/25 to 2026/27 budget submission for the MOPAC and the Met states:

“The extreme demand for public order policing driven by London’s status as a focus for the Israel/Palestine and Just Stop Oil protest activity has massively reduced the resources available for local policing through abstractions and created significant demand on frontline policing. The significant under-funding of the National and International Capital Cities Grant originally calculated as £159m, which when restated to reflect current prices is estimated to be c£240m, needs to be addressed.”⁵²

The flexibility of the NICC grant means it is an important source of funding for the Met. Amana Humayun, Chief Financial Officer at MOPAC, highlighted this to the Assembly’s Budget and Performance Committee on 7 January 2025. She said: “[NICC] does not really come with any further terms and conditions. It allows the Met an element of flexibility. [...] It allows the Met the flexibility to use it wherever their pressures are the greatest.”⁵³

This flexibility is important due to the unpredictable nature of public order policing. This was outlined to us by Commander Louise Puddefoot:

“The thing I would say about public order policing is that it is sometimes very difficult to know before the event what is going to happen and what you are going to need. It is very high-profile. It has a huge impact on trust and confidence because it is so visible. If we get it wrong [...] It is very high-profile and getting it wrong is really, really difficult.”⁵⁴

Unfortunately, the NICC Grant has not increased with inflation, which has represented real term cuts in public order policing. On 17 December 2024, the Home Office announced an additional £65 million for the NICC grant for 2025/26. It stated that the Home Secretary “recognises [the

⁵⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.6

⁵¹ [Written evidence submitted by the Metropolitan Police Service and the Mayor’s Office for Policing and Crime](#), date not provided but submission was around 2015,

⁵² [MOPAC/MPS budget submission 2024/25 to 2026/27](#), p.1-2

⁵³ London Assembly Budget and Performance Committee, [Transcript of Agenda Item 6 – The 2025-26 GLA Group Budget – Mayor’s Office for Policing and Crime](#), 7 January 2025, p.11

⁵⁴ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.8

NICC has] not kept pace with inflation and rising demands of policing the capital.”⁵⁵ The total value of NICC grant for 2025/26 will be £255.2 million.⁵⁶

The increase in the NICC grant announced by the Home Office in December 2024 is welcome. However, when considered alongside the costs for Operation Brocks, as well as the ongoing impact of neighbourhood officers being taken away at short notice to meet public order demand, the Committee believes that this increase does not go far enough.

It is vital that the NICC grant provides a sustainable funding stream for the Met. To do so, the grant must keep pace with annual inflation, rather than being left frozen for multiple years between settlements. This sustainability would allow the Met to plan its response to public order demand further in advance. Given the stark financial situation facing the Met, this will be particularly important in future years.

‘Protester pays’ proposals

In his May 2024 review of political violence and disruption, Lord Walney recommended that the Government should consider whether groups holding a “significant number” of large demonstrations make a financial contribution to the policing costs involved.⁵⁷ Lord Walney expanded upon this recommendation in evidence to the Committee. He said:

“Mass demonstrations, turning up in a particular place at a particular time, is only one way of [getting your point of view across].

If an organisation chooses that particular method, week after week after week, and you can see the strain which it is putting on other policing areas, of course, in an ideal world all of these costs would be met somewhere else, but we are demonstrably not in a world where there are ideal resources and you are having to weigh up cuts to other front line areas to carry on policing.”⁵⁸

However, the Committee also heard views that the proposals to raise funding for the Met’s public order work via contributions from protest organisers do not provide a realistic solution to the resource demands faced by the Met. The Met has a duty to facilitate peaceful protest, and the Committee heard that the involvement of a financial transaction would put this at risk. Kirsty Brimelow KC told the Committee:

“I cannot see how a proposal for protesters to pay is lawful, and it shows a real misunderstanding of articles 10 and articles 11 of ECHR. Article 10(2) means that the right to protest can only be restricted in specific circumstances and payment would not be one of

⁵⁵ Home Office, [Billion pound funding boost for police to keep streets safe](#), 17 December 2024

⁵⁶ House of Commons, [Provisional Police Grant Report \(England and Wales\) 2025-26](#), 17 December 2024

⁵⁷ UK Government Independent Adviser on Political Violence and Disruption, [Protecting our Democracy from Coercion](#), 21 May 2024, p.12

⁵⁸ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.4-5

those circumstances. [...] It would not get off the ground and practically it is completely unworkable and would lead to much discrimination.”⁵⁹

Matt Parr, former Inspector, HMICFRS, told the Committee:

“I think I am probably more instinctively supportive of what lies behind Lord Walney’s proposals, but I agree with Kirsty that it is completely unworkable. Protester pays. I simply cannot see how that could be made to work, even if there was a legal framework that supported it, I cannot see how it could practically be made to work.”⁶⁰

The Committee believes that the extra money required by the Met should come from the Government in the form of an expanded and sustainable NICC grant, rather than requesting a financial contribution from protestors following the evidence it heard that charging protestors would be unworkable.

Recommendation 1

The Government must ensure the National and International Capital City (NICC) Grant it provides to the Met is updated yearly in line with inflation and operational requirements.⁶¹

Recommendation 2

MOPAC should undertake analysis into how the NICC grant is used within the next 6 months, including how the grant could be better calculated to meet the unique demands of policing protest in London.

⁵⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.6

⁶⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.6

⁶¹ Zoë Garbett AM dissents from Recommendation 1. She does not agree with the call to: “ensure the National and International Capital City (NICC) Grant it provides to the Met is updated yearly in line with inflation and operational requirements.” The Committee received written evidence from Network for Police Monitoring (Netpol) highlighting how: “abstraction from local neighbourhood police teams to deploy thousands of officers in central London for public order policing was a choice made by the Metropolitan Police Commissioner”. Assembly Member Garbett agrees that this is a choice made by the Met and believes that the response should not be to increase the Met’s funding, but instead to look at the choices made around how protest and other public order events are policed.

Taking officers away from neighbourhood teams

The Met regularly relies on officers from local boroughs to manage the demand around public order policing. The process is referred to as ‘abstraction’ - whereby local officers are taken off their usual duties to police public order events (often in central London), and is well established within the Met. It enables some degree of flexibility when unexpected large-scale events, such as protests, take place. It also provides the officer numbers required for one-off large-scale events, such as the King’s coronation and Notting Hill Carnival.

Impact on neighbourhood policing teams

The process of taking officers away from neighbourhood duties to police events in central London creates uncertainty, stretches local resources, and creates difficulties around local policing.⁶² We heard from the Met that there is a plan in place to reduce the removal of frontline officers from local areas, but we believe this practice is still too common.⁶³ Similarly, Chief Constable Haward, National Police Chiefs’ Council, told the Home Affairs Committee in December 2023:

“If we put people into mutual aid or into policing protests, they come from our neighbourhood teams and our response teams. We are seeing a denudation of some of our day-to-day resourcing and resilience. We also take into account the investigative burden that comes with a 680 per cent rise in antisemitic crime that is being investigated.”⁶⁴

My previous role was the Basic Command Unit Commander on a busy BCU, Central West, which is Westminster, Hammersmith and Fulham, and Kensington and Chelsea, and I was constantly frustrated [...] not seeing my officers because they were on aid.⁶⁵

Commander Louise Puddefoot, Metropolitan Police

The graph below shows levels of aid and local aid in London since May 2018. Aid refers to officers taken out of wards to provide support at large public events or critical incidents that require a police presence in other parts of London (such as large-scale demonstrations). Local

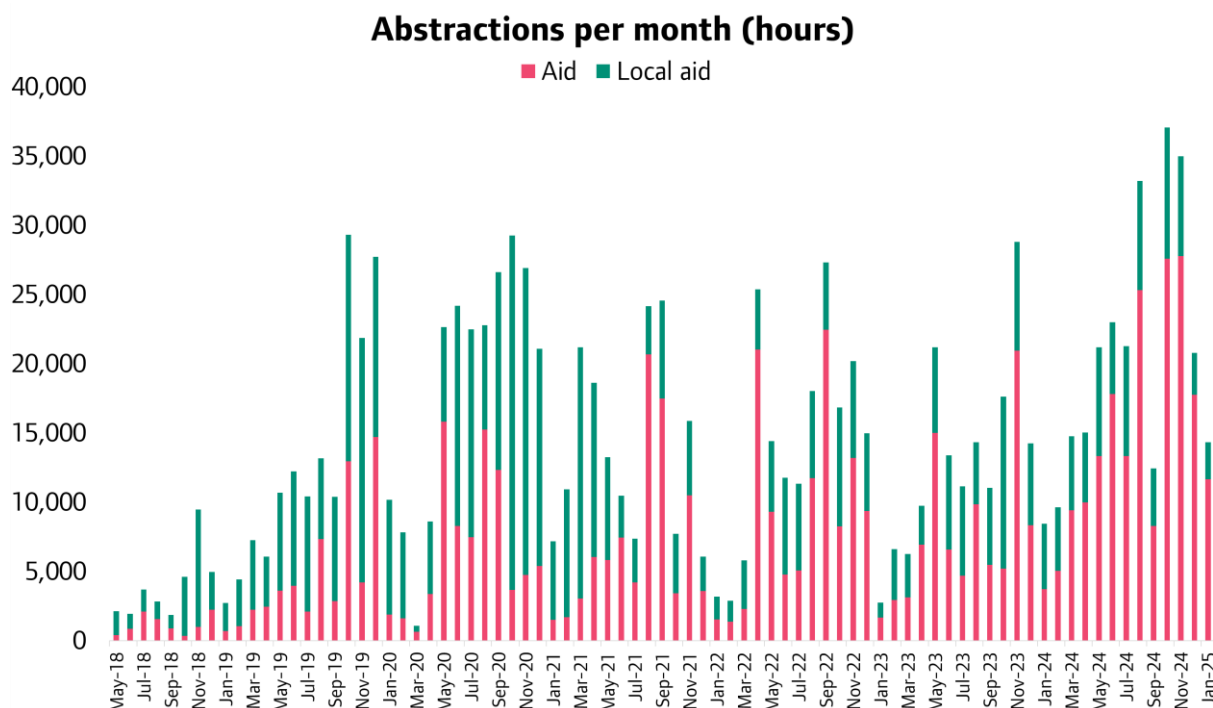
⁶² The Havering Daily, [Police abstractions to central London now causing huge detrimental impacts on our high streets. It’s time to leave local officers in their communities](#), 24 September 2024

⁶³ London Assembly, [Police and Crime Committee Transcript](#), 11 September 2024, p.18

⁶⁴ Home Affairs Committee, [Oral evidence: Policing of Protests, HC 369](#), 12 December 2023

⁶⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.7

aid refers to officers requested to work elsewhere in the Basic Command Unit (BCU)⁶⁶ to support local activities such as sporting events, cultural events and borough based policing operations. The graph shows the unpredictable nature of abstractions, making workforce planning difficult for local teams.



Source: London Datastore, [MPS Dedicated Ward Officer Abstractions and Strengths](#); Scrutiny Research Unit

In July 2024, the then Deputy Mayor for Policing and Crime, Sophie Linden, spoke to the us about the extent to which local officers are being taken away from communities. She said:

“The Met has estimated that between 7 October [2023] and 9 June [2024], there have been 51,799 officer shifts connected to protests or vigils in the London area. That is a huge number of police officers being [taken away] from their local neighbourhood policing and from communities.

They have also had 9,639 shifts completed by officers on mutual aid [where officers from other police services from around the country assist the Met]. We are thankful for other forces lending their officers and coming into London to police the protests, but again that is a burden for other forces.”⁶⁷

⁶⁶ Basic Command Units are the organisations that provide the local policing structure of the Met. There are 12 BCUs, each made-up of between two and four Boroughs. The 12-BCU model replaced the 32 Borough based units (Borough Operational Command Units) in 2018 due to funding cuts.

⁶⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 7 – Question and Answer Session with the Mayor’s Office for Policing and Crime](#), 17 July 2024, p.4

A New Met for London (ANMfL), the Met’s programme for reform, commits the Met to “stopping abstractions from neighbourhood teams, apart from in exceptional circumstances”.⁶⁸ The Committee notes that there is less funding available for ANMfL than anticipated, which may make the commitment harder to deliver.⁶⁹

The Committee heard from the Met about its plans to reduce reliance on taking officers from neighbourhood teams. Assistant Commissioner Matt Twist told the Committee:

“One of the things we have done in the last 12 months is include in everybody’s shift pattern [...] four weekends plus Notting Hill [Carnival] plus New Years Eve. So, that means that we have a much greater pool of people to call on and we are using to a much greater extent non-borough officers, particularly for what I would call level 3 aid, which is where you do not need to be specially public order trained for the lower risk events, which is significantly reducing the abstractions that you are seeing.”⁷⁰

Similarly, Commander Louise Puddefoot told us about an Aid Reduction Plan the Met is working to, stating: “I have an Aid Reduction Plan to try and reduce the impact of aid on the rest of policing and we are working really hard to do that, but it takes a lot of effort and it has been a big focus.”⁷¹ While this is welcome, the Committee believes it does not provide visible reassurance to local communities from which officers are taken at short notice. For example, a HMICFRS report from 2024 said that “abstracting neighbourhood officers from their core role has a negative effect on their work preventing crime,” including antisocial behaviour and shoplifting, meaning communities may not receive the service they require protests.⁷²

No further information was provided to the Committee on the details of this aid reduction plan, or whether it will be made public. The Committee accepts that it may not be possible to publish the entire plan. However, some further details of the plan, including how it will reduce the reliance on local teams, would provide local communities with assurance, particularly those concerned about neighbourhood officers being withdrawn at short notice.

The Committee welcomes the Met’s commitment to reduce the time neighbourhood officers are taken away from regular duties, but would like to see clearer evidence of what action the Met is taking to work towards this goal.

⁶⁸ Metropolitan Police, [A New Met for London 2023-2025, July 2023](#), p.19

⁶⁹ The Commissioner of the Met, Sir Mark Rowley, told the Committee on 12 February 2025: “As part of making choices, we have trimmed our ambitions on reform, that is the reality.”

⁷⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.18

⁷¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.8

⁷² HMICFRS, [PFEL 2023–25 Police effectiveness, efficiency and Legitimacy An inspection of the Metropolitan Police Service](#), p.15

Recommendation 3

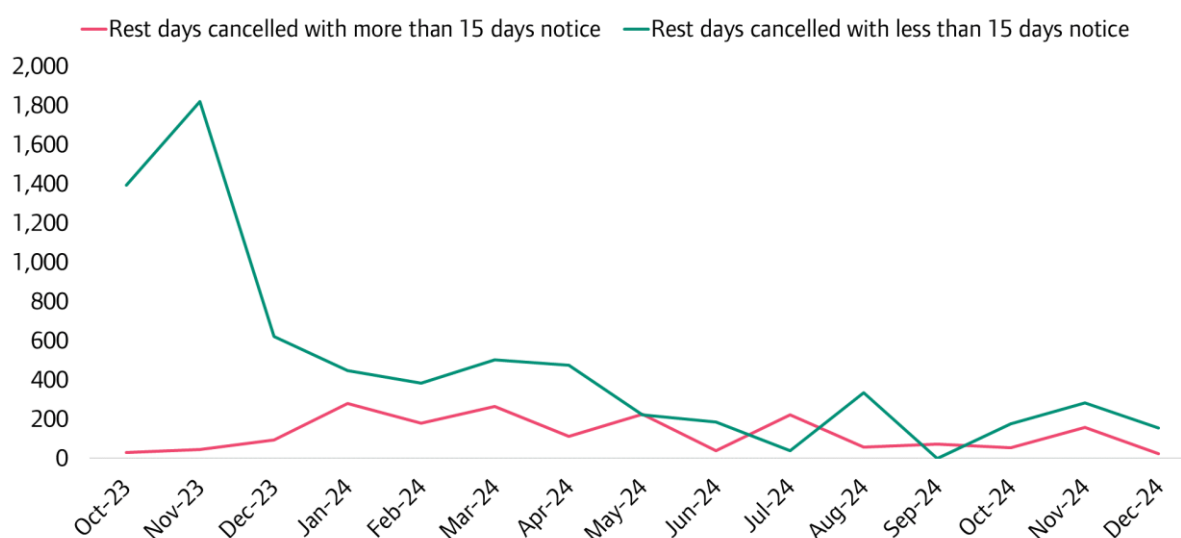
The Met must publish its Aid Reduction Plan, or a summary thereof, to provide reassurance to local communities concerned about the impact of abstractions on neighbourhood policing. This plan should include a medium to long-term strategy for reducing neighbourhood abstraction levels by 50 per cent within the next five years.

Impact of increased public order demand on officers

Cancelled rest days

The Committee heard that the cumulative demand of public order policing was having a personal impact on police officers. For example, the often unpredictable nature of public order policing can lead to a significant number of officers having their rest days cancelled. In general, if an officer has a rest day cancelled with less than 15 days’ notice, they are entitled to claim every 15-minute period worked at time and a half.⁷³ Alongside the negative impact on wellbeing, increased rest day cancellations at short notice also have a financial impact on the Met.

Rest days cancelled due to protests related to conflict in Middle East since October 2023



Source: Metropolitan Police⁷⁴

The chart above shows that a higher number of rest days were cancelled with less than 15 days’ notice at the start of the regular schedule of protests in London in October 2023. This was partly caused by the scale of these demonstrations, which have since reduced in attendance from 300,000 in November 2023 to around 60,000 in September 2024.⁷⁵ It may also have been caused by the sudden nature of the early demonstrations, and the need for the police to act quickly. The decline shows that with a regular, more predictable schedule of protest, police planning can reduce unexpectedly cancelled rest days.

⁷³ Police Federation City of London, [Overtime](#)

⁷⁴ Data taken from Op Brocks cost and resource data from [October 2023 – December 2023](#), [January - March 2024](#), [April – June 2024](#), [July to September 2024](#), [October 2024 to December 2024](#)

⁷⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

Cancelled rest days – impact on wellbeing

Assistant Commissioner Matt Twist told the Committee about the impact cancelled rest days can have on individual officers. He said:

“The demand is huge. It means longer shifts. It means cancelled rest days. And to your point, what is the resilience of the organisation? What is the resilience of the individuals? [...] there is an impact on the people, and these are the same officers that on one shift will be working in communities, will be working on response teams, will be working on investigations that are now stepping up to work in things like Notting Hill, protests, state occasions, other things.

[...] We have a number of schemes in place to support our officers with their mental health and a number of ways they can reach out and seek that support, but I would not be right if I did not say that it has been a very challenging period for those officers and I think that is going to continue.”⁷⁶

Officers who have undertaken specialist public order training⁷⁷ are in demand in the Met, and are more likely to be called in to work at the weekend at short notice to “drive a carrier and do public order tactics.”⁷⁸ In addition, police officers who have undertaken the Level 2 training course, the intermediate level of public order resource, regularly undertake additional public order work on top of their regular officer duties.

We heard how a high level of cancelled rest days can lead to this Level 2 public order specialist training becoming less desirable to officers. Commander Louise Puddefoot told us that officers who had undertaken this training were stepping back from this specialist duty “because they feel that they are giving up their rest days and time with their families to be policing protests.”⁷⁹ She added:

“it is about work-life balance. If you have a particular skill set in the MPS then you are much more likely to be warned for aid. An officer that works in an office and is not public order trained cannot be used to police protest in the same way that somebody who has the qualifications to drive a carrier and do public order tactics can. For some people who have perhaps more commitments with home, they are saying that that is a big commitment to do.”⁸⁰

⁷⁶ London Assembly Police and Crime Committee, [Question and Answer Session with the Mayor's Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.19

⁷⁷ Those officers who have undertaken Level 2 public order training. Level 3 public order duties require no additional training and is included in basic officer training. Level 1 is the most specialised, and is usually limited to those in the Territorial Support Group and specialist firearms units.

⁷⁸ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.3

⁷⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.2

⁸⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.3

As officers step away, the pool of available officers become smaller. This is placing more pressure on those who remain. Commander Louise Puddefoot told the Committee the Met is seeking to reverse this trend:

“We are working hard to increase public order trained officers in the MPS and, at the moment, the numbers are remaining static. People are handing in their public order tickets [the qualification that allows officers to undertake specialist public order duties, known as Level 2 training].

[...] we also have a programme of work to increase the numbers of officers that are trained in public order tactics and that is a focus for us.”⁸¹

Given the regular nature of current protests, alongside wider public order work, it is clear that the Met needs to prioritise greater sign-up to the public order career pathway, and specialist public order training. This should include work the Met is already doing, such as encouraging more women to sign-up, and encouraging officers to complete public order training at Gravesend.⁸² It should also include wider consideration of benefits accompanying additional public order duties, including increased financial reward.

Recommendation 4

The Met should undertake internal survey work to ensure it fully understands why officers are handing in their public order tickets and what incentives would encourage them to continue public order work. The Met should also use the results to develop an action plan within the next 12 months to ensure targeted and tailored support to officers.

Recommendation 5

The Met should launch an internal campaign to encourage greater sign up to public order training at level 2. The Met should report back to the Committee within 12 months on what action has been taken to encourage greater take up of level 2 training and the results.

⁸¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.2

⁸² London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.3

Officer morale

The Committee heard some concerning statistics on officer morale during this investigation. Simon Hill, Deputy General Secretary and Public Order Lead at the Metropolitan Police Federation, cited figures from the Police Federation of England and Wales annual pay and morale survey of members. He told the Committee:

“Morale is poor. I pulled off a couple of figures from the pay and morale survey from 2023. In terms of pay and in terms of morale - this is MPS-specific officers - 71 per cent of respondents said their morale was low or very low, and 96 per cent of respondents felt that morale within the MPS was low.”⁸³

In relation to the impact on morale of extensive public order duties, Commander Louise Puddefoot highlighted the support the Met is providing to officers. She said: “we often have a Bronze welfare⁸⁴ as part of the command team - that is how much we prioritise the wellbeing of the officers involved - for refreshments, taking people home after a particularly long shift, and so on.”⁸⁵

The Committee also heard about the difficulties of negative posts on social media for officers and high levels of media scrutiny contributing to low morale and reduced wellbeing. Commander Puddefoot told the Committee:

“One of the things that is making in particular these demonstrations around [...] the Middle East conflict difficult is the media scrutiny and the fact that officers who are doing their best in policing a very difficult, complex geopolitical situation are then finding themselves going viral on social media for saying the wrong thing. Sometimes it is edited and taken out of context, and that is a huge pressure for an officer who is not in public order policing day-to-day.”⁸⁶

[Officers] are drafted in from Bromley, Hillingdon, wherever, into the middle of London to police a march, and then find themselves subjected to huge criticism extremely publicly. We always wrap around those officers and make sure that they are OK, but I think that is a fear for officers, and that is very difficult for us to control.”⁸⁷

Commander Louise Puddefoot, Metropolitan Police

⁸³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.9

⁸⁴ ‘Bronze welfare’ refers to a senior officer designated as the go to welfare support for all officers serving on a particular protest.

⁸⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.10

⁸⁶ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.10

⁸⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.10

The Committee believes that the Met should consider including a commitment to deliver specific mental health and wellbeing support for public order officers in its upcoming renewal of the New Met for London plan. In addition, mental health support should be provided for officers who undertake public order duties, particularly those who are exposed to criticism and personal attack on social media.

Recommendation 6

The Mayor and the Met should provide mental health support for officers who undertake public order duties, particularly those who are exposed to criticism and personal attack on social media.

Notting Hill Carnival

Notting Hill Carnival is an important date in London’s calendar. It is a unique celebration of Caribbean culture and history within the city and attracts around two million visitors each year.⁸⁸ This volume of people also creates a complex policing challenge.

In 2024, Notting Hill Carnival took place on the bank holiday weekend of 24 August. The majority of the carnival passed off peacefully, but policing challenges included high density of people, a lack of stewarding, and specific pinch points around the Ladbroke Grove area. Two people tragically died at the event as a result of violent crime: 32-year-old Cher Maximen and Mussie Imnetu, a chef visiting from Dubai. Despite this, Notting Hill Carnival Ltd has stated in response to the policing of high-density people that: “We do not recognise any situation in which it was required for the police to be called in to help with crowd management.”⁸⁹

As part of its policing operation, the Met had around 7,000 officers on duty, drawn from local policing teams as well as specialist units, with a total of around 14,000 officer shifts across the whole event. A specialist crowd management cell, first introduced in 2023, was also in place.⁹⁰

The Committee heard some positive stories about policing at Carnival. In a response to its survey, the Committee was told that “relations between police and revellers are generally good.” One respondent wrote: “generally excellent relations between revellers and police, and frequent occurrences of officers tending to those who have ‘over indulged’ or become injured in some way.”⁹¹ These positive stories often get lost among more negative stories following Carnival and should not be forgotten.

Stewarding

The organiser of the Carnival, Notting Hill Carnival Ltd,⁹² has responsibility for providing stewarding for the event, and for ensuring crowd safety. Assistant Commissioner Matt Twist told the Committee that at Carnival, the Met has responsibility for “prevention and detection of crime, for keeping the King’s peace and, if necessary, for saving life.”⁹³

⁸⁸ BBC News, [Fabulous costumes and a ‘feast for the senses’ as thousands turn out for Notting Hill Carnival](#), 26 August 2024

⁸⁹ BBC, [Notting Hill Carnival is poorly run – Met chief](#), 19 September 2024

⁹⁰ Metropolitan Police, [Met sets out policing approach ahead of Notting Hill Carnival](#), 23 August 2024 and Independent, [7,000 Officers to police Notting Hill Carnival as one million people expected to attend](#), 25 August 2024

⁹¹ Police and Crime Committee, Survey responses: Public order policing

⁹² Notting Hill Carnival Ltd were invited to give evidence to the Committee, but the Committee did not receive a response.

⁹³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 – Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.2

The Committee heard from Assistant Commissioner Matt Twist that the organisers at the 2024 event did not provide levels of stewarding required to ensure crowd safety.⁹⁴ This led to officers being posted into what he described as “entirely stewarding roles”. AC Twist argued that this was an “inappropriate use of police resources”.⁹⁵ Moreover, the lack of sufficient stewardship at the carnival can result in those running stalls breaching their licences by failing to train staff and report incidents of violence. One such incident occurred during the 2024 Notting Hill Carnival whereby staff failed to notify police or the ambulance service regarding a serious assault, with the victim receiving deep lacerations after being attacked by someone with a bottle. The Volcano Sound System company, who had responsibility over the area in which the incident occurred, has been accused of breaching 13 licencing conditions and the emergency services were only contacted when a member of the public had cause for concern regarding the unconscious victim.⁹⁶ Lack of engagement with staff and the police is likely to exacerbate concerns regarding a potential crush.

*[2024’s Carnival] started as previous years have started with my Gold Commander writing in their log that we are having to deploy officers from the very start in order to backfill areas where the organiser has been unable to provide sufficient stewarding or crowd control.*⁹⁷

Matt Twist, Assistant Commissioner, Metropolitan Police

The Committee heard evidence relating to the risk of a potentially life-threatening crush scenario at Carnival, and that risks around crowd density had been exacerbated by increased numbers attending Carnival over the last several years.⁹⁸

Assistant Commissioner Matt Twist told us:

“Then probably the most concerning element, the thing that I am always most worried about with Carnival, is crowd density. Over the course of Notting Hill Carnival weekend, we had 100 spontaneous crowd incidents which were monitored through the joint cell. In addition to the frequent monitoring of nine key locations that we know are challenging and reporting across all five of the MPS sectors, we did have to step in a number of times in order to reduce the crowd density in order to save life.”⁹⁹

⁹⁴ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.2

⁹⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.5

⁹⁶ BBC News, [Met calls for Carnival stand closure after assault](#), 19 March 2025

⁹⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.2

⁹⁸ The then Deputy Mayor for Police and Crime told the Committee on 11 September 2024 that “the crowds have increased and increased every year”.

⁹⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor’s Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.1

Given the large number of people in attendance, the Committee heard that the lack of stewarding contributes to risk around crushing. Assistant Commissioner Matt Twist told the Committee: “Last year we had an incident where members of the public were being hoisted up on to scaffolding at the side of the road to get out of what was a really dangerous level of crowd density.”¹⁰⁰

The Committee was concerned to hear about the Met having to intervene in crowd density to save lives on multiple occasions. It was also concerned to hear about the consequences of crowd density, with police officers not being able to reach serious situations due to the depth of the crowd. Assistant Commissioner Matt Twist highlighted the area towards the top of Ladbroke Grove as a pinch point: “Later on the Monday this year towards the top of Ladbroke Grove, we had instances where officers literally could not move due to the level of crowding that we saw.”¹⁰¹

*While we acknowledge the crime often gets the headlines, the thing that worries me most is the crowd density and the potential for a mass casualty event.*¹⁰²

Matt Twist, Assistant Commissioner, Metropolitan Police

In 2017, Movement Strategies was commissioned, on behalf of the Strategic Partners Group,¹⁰³ to undertake a crowd dynamics study of NHC. Movement Strategies highlighted “a range of interventions, including changes to site design and operations, a strategic approach to risk, and setting up methods for gathering more information about the Carnival and visitor behaviour patterns”. It reported that many of these were taken on board in 2017, “with others providing a platform for further improvements in future years”.¹⁰⁴

In answer to a Mayoral Question in October 2024 on the safety of Carnival and how the Mayor would ensure the safety of future events, the Mayor said that “plans will continue to be reviewed and adapted each year, taking into account lessons learned.”¹⁰⁵ However, the Committee believes that there are problems with crowd density at the event that have not been properly addressed. This demands a full review of current practices around crowd density, building on the study undertaken by Movement Strategies, be commissioned by the Mayor. The review should include a full risk assessment of specific pinch points and ways to alleviate or

¹⁰⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor's Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.6

¹⁰¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor's Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.2

¹⁰² London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor's Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.1

¹⁰³ The Strategic Partners Group includes: Mayor’s Office for Policing and Crime, London Notting Hill Carnival Enterprises Trust, Metropolitan Police Service, Transport for London, Royal Borough of Kensington and Chelsea and Westminster City Council (see Movement Strategies, Movement Strategies advises on crowd dynamics at Notting Hill [Carnival](#), 19 September 2017)

¹⁰⁴ Movement Strategies, Movement Strategies advises on crowd dynamics at Notting Hill [Carnival](#), 19 September 2017

¹⁰⁵ London Assembly, [Mayoral Question: Notting Hill Carnival](#), 10 October 2024

avoid these. Strict guidance is also required for the number of stewards needed at the event, with consideration given as to whether this requires additional Mayoral funding.

Recommendation 7

The Mayor must commission a review of crowd density and crowd safety at Notting Hill Carnival to inform stewarding requirements. This must include a full review of pinch points and strict guidance for the number of stewards required across the Carnival. The findings of this review should be made public at least three months in advance of Carnival 2026.

Policing football fixtures

The policing of football in London is part of the Met’s overall public order work. In the first part of the 2024/25 football season, from August to October 2024, 7,204 officer shifts were used policing football matches in London.¹⁰⁶ While football clubs themselves are responsible for safety and security inside football stadiums and on the footprint immediately outside, police are required to cover all other elements of matchday policing. This includes transport, city centre coverage, and streets around the ground.

Finance and recouping costs from clubs

Over the 2023/24 football season, policing football matches cost the Met around £24 million.¹⁰⁷ While football clubs in London do make a financial contribution to policing costs, this only covers around 10 per cent of total expenditure. For the 2023/24 season, the Met was only able to recoup around £2.4 million from clubs.¹⁰⁸

*If we put 30 police support units (PSUs) of cops at Wembley [Stadium] for a high-risk game, we can recoup [from clubs] only the cost of the officers that are actually on the concourse or inside the Stadium.*¹⁰⁹

Commander Louise Puddefoot, Metropolitan Police

The Committee explored whether football clubs should make a greater financial contribution to policing football costs. Professor Geoff Pearson, University of Manchester, told the Committee that while there was an argument that Premier League clubs could potentially contribute more, many smaller football league clubs were already struggling financially, and may be “driven to the wall” by increased policing contributions.¹¹⁰

¹⁰⁶ London Assembly, [Mayoral Question: Football Policing in the first month of 2024/2025 Season \(1\)](#), 10 October 2024

¹⁰⁷ Metropolitan Police, [Football Data – Finance Data – 2023-24 Season](#), September 2024

¹⁰⁸ Metropolitan Police, [Football Data – Finance Data – 2023-24 Season](#), September 2024

¹⁰⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 - Public Order Policing](#), 6 November 2024, p.27

¹¹⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.14

The concern from the English Football League – and I think it is a valid one – is that actually if Football League clubs are breaking even then they are doing a very good job and additional pressures in terms of having to pay for police which they would say, ‘Some of this is already coming out, we are paying in taxes’, may well drive some clubs to the wall.¹¹¹

Professor Geoff Pearson, University of Manchester

The Football Governance Bill is currently going through Parliament. This Bill would establish an independent football regulator. There is no mention of the cost of policing games either in the explanatory notes to the Bill, or in the Bill itself.¹¹² The Committee would like to see the regulator take on a role in placing the policing of matches on a more sustainable footing.

Recommendation 8

The Government should include the cost of policing football matches in the remit of the new Independent Football Regulator. The Government should review the policing of football matches so it is placed on a more sustainable footing, with more equitable contributions to matchday policing from the Premier League and Premier League clubs.

Project ENABLE

As an alternative way to reduce costs, without having to rely on clubs to contribute more, the Committee heard about an initiative called Project ENABLE that had successfully reduced the number of officers required to police matches.

Project ENABLE is an ongoing project examining football policing, focusing on developing innovative approaches to crowd safety at football matches. It was launched in 2017 by academics Professor Clifford Stott and Professor Geoff Pearson; is now led by Dr Mike Hope from Keele University, and initially funded by the academic-police collaboration project, the N8 Policing Research Partnership. In 2019, Project ENABLE began working with police services across the UK to examine whether fewer officers with special football-related training would be more effective at policing matches.¹¹³

¹¹¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.14

¹¹² [Football Governance Bill: Explanatory notes](#)

¹¹³ The Guardian, [Fans are focus of Football League project to reduce match-day policing](#), 24 October 2019

Following observations at five matches, Project ENABLE reached three initial findings: the risk of violence was generally lower than the police had expected; too many officers were on duty; and too few were speaking to supporters.¹¹⁴ It raised questions over whether more targeted police resources could effectively police games, thus reducing public order demand on the Met.¹¹⁵

*Ultimately more police officers in football does not tend to mean more effective football operations in terms of public order.*¹¹⁶

Professor Geoff Pearson, University of Manchester

Professor Geoff Pearson, co-lead on the ENABLE programme, told the Committee:

“What we tend to see in terms of how football is traditionally policed is that we will have Police Support Units (PSUs), so three serials of officers in three vans that will stand around in groups essentially acting as a deterrent or waiting to react to disorder. [...] the Enable Project [...] trialled a new system that instead of bringing in public order officers from these PSUs, they would have a single PSU when they could, which was made up of operational Football Officers, so officers that were specifically trained in managing football crowds and in terms of identifying risk but also being proactive.

What they found was that, first of all, over those 16 matches, they were able to prevent the unnecessary extraction of 499 officers [...] over those 16 matches. Those were officers, which [...] could have been investigating murders and meant that they could stay in their normal jobs. In terms of the outcomes, there was no increase in public disorder, but there was an increase in terms of crime detections at those matches which indicated that the officers were doing more, so actually the taxpayer was getting more for less.”¹¹⁷

Commander Louise Puddefoot confirmed to the Committee that the Met is working with the ENABLE programme. Commander Puddefoot also told the Committee that the project was part of the Met’s Football Strategy. She said:

“The Met is working with ENABLE and basically replacing serials of officers with fewer, specially trained football spotters. It is really well embedded and it is one of the four

¹¹⁴ The Guardian, [Fans are focus of Football League project to reduce match-day policing](#), 24 October 2019

¹¹⁵ University of Manchester, [English Football League announces groundbreaking policing project](#), 24 October 2019

¹¹⁶ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.14

¹¹⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.14

pillars of our MPS football strategy. Last season we saved £335,000 in costs and we anticipate greater savings next year.”¹¹⁸

The Committee has not seen the Met’s Football Strategy, and it does not appear to be available online. There is also a lack of information publicly available around Project ENABLE, the findings of which could potentially be built on in terms of using fewer, but more specially trained officers, to complete wider public order work beyond football.

The Committee welcomes the evidence it heard of the ENABLE programme’s success to date. Yet, it is important a full evaluation of the programme and its use in London is undertaken. This is so that the findings can be cemented in ongoing public order practice, potentially leading to cost savings in the future.

We are particularly interested in whether lessons from the programme – regarding achieving better results with fewer officers – are specific to football or applicable to wider public order policing.

Recommendation 9

The Met should conduct an evaluation of its work on the ENABLE project by the end of December 2025. The Met should publish a summary of findings from this evaluation, including scoping whether lessons learnt from ENABLE could be used to reduce officer numbers required for wider public order policing.

¹¹⁸ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.26

A complex picture: new laws around protest

The Government has introduced new legislation since 2022,¹¹⁹ altering the legal landscape around protest. This was partly in reaction to tactics used by direct action protest groups, such as Extinction Rebellion and Just Stop Oil. This has caused debate over the balance between the right to protest, and the desire of the public to avoid disruption.

The Committee heard a range of views about the desirability of new legislation. Some of our guests argued that it infringes and threatens the right to protest. Others argued the new legislation does not go far enough. The Met has said that the increased volume of legislation has created additional complexity. This complexity creates a challenge for police in maintaining a proportional approach to protest.

Background

Articles 10 and 11 of the ECHR protect right to freedom of expression and freedom of assembly.¹²⁰ ¹²¹ These are enshrined in UK law by the Human Rights Act 1998.¹²² A protest has to be peaceful to qualify for protection under Articles 10 and 11.

In 2021, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) published a report on the balance of proportional policing between the right to protest and the public's tolerance for disruption related to protest. This report argued that this balance between the right to protest and public tolerance for disruption “may tip too readily in favour of protesters”.¹²³

In 2022, the Government introduced new legislation around protest through the Police, Crime, Sentencing and Courts Act.¹²⁴ This was followed by further legislation, the Public Order Act, in 2023, which introduced:

- New offences around locking-on and being equipped to lock-on, which covers instances where an individual attaches themselves to another person, object or to land
- Extended stop and search powers related to articles associated with protest, which allow police to search and seize articles connected with protest, and powers to stop and search without suspicion

¹¹⁹ New legislation includes the [Police, Crime, Sentencing and Courts Act 2022](#) and [Public Order Act 2023](#)

¹²⁰ [ECHR](#), p.12

¹²¹ These rights are enshrined in UK law by the Human Rights Act 1998.¹²¹ A protest has to be peaceful to qualify for protection under Articles 10 and 11.

¹²² See [Human Rights Act 1998](#)

¹²³ See: [Police, Crime, Sentencing and Courts Act 2022](#)

¹²⁴ See [Police, Crime, Sentencing and Courts Act 2022](#)

- and provision for banning orders to prevent those convicted of two or more protest related offences from attending future protests.¹²⁵

Some guests argued that new legislation threatens the protected right to peaceful protest. Kirsty Brimelow KC, Barrister at Doughty Street Chambers, told the Committee that she was concerned that the balance had shifted too far against the protester, with a move to quick enforcement and what she considered to be unacceptable levels of crackdown, particularly post-Covid-19.¹²⁶ She cited, as an example, protests from environmental campaign group, Just Stop Oil, where protesters carrying out a slow march on Lambeth Bridge in July 2023 were removed more swiftly than may previously have been the case. Kirsty Brimelow KC suggested this was a disproportionate response: “The inconvenience, the disruption caused, according to what I have seen, probably was in the range of about five minutes inconvenience to traffic. There was a lane for emergency vehicles to pass and this was not an extensive blockade.”¹²⁷

These concerns around disproportionality were echoed by other guests. Jodie Beck, Policy and Campaigns Officer at civil liberties campaign group Liberty, told us: “at Liberty we would argue that that balance has shifted further away from protesters and that balance is not quite right at the moment.”¹²⁸

A “cluttered legal landscape”

The Committee heard that the introduction of two new pieces of legislation in 2022 and 2023 has created a more complex and cluttered legal landscape around protest and wider public order policing. It was suggested to us that this has added complexity to an already complex area of policing.

The main piece of legislation used by the Met in its public order work is the Public Order Act 1986 (POA 1986). In July 2024, the Committee was told by then Deputy Mayor for Policing and Crime, Sophie Linden that the 1986 Act is still the main piece of legislation used by the Met in policing protest: “The advice we get from the Met is that when they are policing the protests, they rely more heavily on powers under the 1986 Public Order Act and have been very much using those powers in the policing of protests in London since 7 October [2023].”¹²⁹

¹²⁵ All measures included in [Public Order Act 2023](#)

¹²⁶ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.2

¹²⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.2

¹²⁸ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.6

¹²⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 7 – Question and Answer Session with the Mayor's Office for Policing and Crime](#), 17 July 2024

Public Order Act 1986

Section 11 requires protest organisers to provide at least six days notice of a procession.^{130 131}

Section 12 allows conditions, such as a specific route and start and finish times, to be imposed on processions.¹³²

Section 14 provides the powers for imposing conditions on static protests or assemblies.¹³³ Conditions for both Section 12 and Section 14 orders can be imposed by a senior police officer if they “reasonably believe” that the protest may result in “serious public disorder”, “serious damage” to property or “serious disruption to the life of the community”.¹³⁴

Section 13 of the POA 1986 allows a chief officer to apply to the Home Secretary to prevent protests from taking place in a specified area for a period of up to three months at a time.¹³⁵

Assistant Commissioner Matt Twist confirmed to the Committee that the POA 1986 was being used extensively when policing protests in London. He added that the use of Section 12 and Section 14 powers to impose conditions on public marches and assemblies was at the highest level since the legislation was introduced.¹³⁶

Other guests echoed these comments. The Committee also heard that that the POA 1986 was sufficient for dealing with protests, and that new legislation was not helpful. Jodie Beck, Policy and Campaigns Officer at Liberty, told the Committee:

“There is a very, very cluttered legal landscape for the policing of protest, and what actually happens when governments reach for new tools is they are simply adding to that very complex web of legislation when there is sufficient evidence to suggest that that police are using the powers they had before.”¹³⁷

¹³⁰ [Public Order Act 1986, Section 11](#)

¹³¹ POA 1986 defines processions as a procession in a public place intended to: (a) demonstrate support for or opposition to the views or actions of any person or body of persons, (b) to publicise a cause or campaign, or (c) to mark or commemorate an event.

¹³² [Public Order Act 1986, Section 12](#)

¹³³ POA 1986 defines public assembly as an assembly of 2 or more persons in a public place which is wholly or partly open to the air. This is sometimes known as a static protest.

¹³⁴ [Public Order Act 1986, Section 14](#)

¹³⁵ [Public Order Act 1986, Section 13](#)

¹³⁶ London Assembly Police and Crime Committee, [Transcript of Agenda Item 6 - Question and Answer Session with the Mayor's Office for Policing and Crime and the Metropolitan Police Service](#), 11 September 2024, p.16

¹³⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.8

Similarly, in written evidence submitted to the Committee, Netpol argued that “there was already wide-ranging public order laws in place [...] under previously existing laws”.¹³⁸

The Committee heard that powers to impose conditions on processions and assemblies were important tools in allowing the police to manage largescale protest. This was particularly true for protests in central London, where certain routes were known to the Met, and were much better suited to handling and containing large crowds safely. Matt Parr told the Committee:

“The Met has a sort of basic policy, which is, although it is inconvenient for the centre of London, the more protests that happen in the centre of London at the weekend are easier for them to control. I remember talking to a Public Order Commander and saying, ‘This is all going very well’, and her response to me was, ‘Yes, but crikey, if this was happening in Bromley, it would be out of control by now.’

That is partly because of the level of experience in running protests in that central area, and frankly the level of CCTV access, no communications blind spots. [...] it allows it to control, from a public order and public safety point of view, the protests in a way that it would find much more difficult had it not put certain strictures on it.”¹³⁹

In written evidence submitted to the Committee the Met confirmed the following use of powers since 2023.

Met use of POA 1986 powers, Jan 2023 up until October 2024

POA 1986 power	Number of uses
Section 12 (conditions on processions)	37
Section 13 (prevention orders)	0
Section 14 (conditions on assemblies)	61

Source: Written evidence received from the Met

Should powers to ban protests be strengthened?

Section 13 of the POA 1986 allows a chief officer to apply to the Home Secretary to prevent protests from taking place in a specified area for a period of up to three months at a time. The use of Section 13 powers to prevent protests going ahead in a specified area is highly unusual. A 2014 Freedom of Information request to the Home Office showed that between 2005 and 2012, the Met only used the power on two occasions.¹⁴⁰

¹³⁸ Written evidence submitted by Netpol (The Network for Police Monitoring), 4 September 2024
¹³⁹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.10
¹⁴⁰ Home Office, [FOI release: Applications for a banning order under Section 13 of the Public Order Act 1986](#), 6 June 2014

The Committee heard some evidence calling for banning powers to be strengthened. Lord Walney, the Government’s Independent Adviser on Political Violence and Disruption, told the Committee:

“there is no power to say, ‘Do not have the march in London this week or vary the date’, the police do not have that authority and they should have the ability to take into account cumulative disruption in making those recommendations to the Home Secretary.”¹⁴¹

This point builds upon a recommendation from his review, *Protecting our Democracy from Coercion*, published in May 2024. In the review, Lord Walney recommended that the POA 1986 be amended to allow police to apply for Section 13 banning orders on a wider range of grounds, including protest that may result in “intimidation from threatening or abusive conduct, or where there is a demonstrable cumulative impact on serious disruption.”¹⁴² As part of this recommendation, Lord Walney said:

“Officers should consider the disruption being caused by the frequency of repeated demonstrations as they seek to balance people’s right to protest with the negative impact that certain protests may have on communities and show that conditions imposed on previous protests have not kept disruption at an acceptable level.”¹⁴³

The Committee acknowledges that largescale and regular protests can be disruptive to the wider public. Indeed, some level of disruption is part of the very nature of protest itself. However, the Committee believes that the fact that the Met has very rarely made use of existing Section 13 powers suggests there is currently little immediate call for expansion.¹⁴⁴

How should ‘serious disruption’ be defined?

The Met can impose conditions on protest if it reasonably believes that a threshold for “serious disruption to the life of the community” is passed. This means the definition used for what constitutes serious disruption forms an important part of public order policing. The Committee heard evidence around changes to the definition of serious disruption.

Previously, serious disruption was defined as disruption that was “significant and prolonged”.¹⁴⁵ In 2023, regulations were passed that reduced this threshold to include anything “more than

¹⁴¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.12

¹⁴² UK Government Independent Adviser on Political Violence and Disruption, [Protecting our Democracy from Coercion](#), 21 May 2024, p.286

¹⁴³ UK Government Independent Adviser on Political Violence and Disruption, [Protecting our Democracy from Coercion](#), 21 May 2024, p.286

¹⁴⁴ Lord Walney argues the lack of use of this power is due to the threshold of the power rather than necessity.

¹⁴⁵ The full text is: anything that will “cause significant delay to the delivery of a time-sensitive product; or cause prolonged disruption to the access of essential goods/services.” (Source: Liberty, [Explainer: New regulations re-defining ‘serious disruption to the life of the community’ enhance police powers to restrict your protest](#))

minor”.¹⁴⁶ These regulations came into force on 15 June 2023,¹⁴⁷ meaning that the Met began using this definition in its public order work.

Liberty launched a legal challenge against the regulations in 2023. It argued that the legislation “significantly lowered the threshold of when the police can impose conditions on protests”, which amounted to “almost unlimited” powers for the police to restrict protests.¹⁴⁸

On 21 May 2024, the High Court quashed the regulations and upheld Liberty’s challenge, stating that the change to include “more than minor” altered, rather than clarified, the meaning of the phrase “serious disruption”, and that the Government failed to consult widely when introducing the regulations.¹⁴⁹

The then Government appealed against this ruling in the Court of Appeal. The high court has suspended the reversal of the measures until after the outcome of the appeal, meaning that at the time of writing, the regulations are in force.¹⁵⁰

The Met has been using the “more than minor” definition included in new regulations, creating uncertainty about what happens to those convicted under the new regulations if the legal challenge is upheld.¹⁵¹

The Committee heard that this legal limbo regarding the definition of serious disruption is creating a difficult situation for both protesters and the Met. Kirsty Brimelow KC told the Committee:

“Those regulations which lowered that threshold currently are in a status where they have been declared unlawful by the High Court, but it is in a state of limbo [awaiting appeal]. [...]

It is causing a real problem for the police now because that judgment is there, it has been there since May [2024], and we are in absolute limbo. We have these regulations, and the police should not be arresting for protests where disruption is “more than minor”. They should be back to the primary legislation of ‘serious disruption’, and that has been

¹⁴⁶ [Public Order Act 2023, Section 34](#)

¹⁴⁷ Public Law Project, [Home Secretary challenged over game-changing attempt to make new protest laws](#), 5 October 2023

¹⁴⁸ Liberty, [Court finds Government anti-protest legislation unlawful after Liberty legal challenge](#), 21 May 2024

¹⁴⁹ See [Judgement from Divisional Court, 21 May 2024](#)

¹⁵⁰ The Guardian, [Suella Braverman acted unlawfully by making it easier to criminalise protests, court rules](#), 21 May 2024

¹⁵¹ The new definition for serious disruption was used by the Met during an environmental protest in October 2023 by groups including Fossil Free London and Greenpeace, who blocked the entrance of a hotel hosting a conference attended by oil companies. Superintendent Matthew Cox issued a section 14 order, [stating](#): “I based it on the fact that the disruption to the life of the community was more than minor” (Source: [The Guardian](#)). Protesters, including environmental activist Greta Thunberg, were arrested for failing to comply with the section 14 order. They later had their charges overturned in court.

causing a problem and we can see those cases clogging up the courts and taking up time and expense.”¹⁵²

Kirsty Brimelow also raised concerns about the new definition being used to impose Section 12 orders, used to dictate the times and route a march must take, at shorter notice:

“[Protesters] experienced an officer saying to them a section 12 condition is now applying and there was no detail as to the condition and within 15 minutes they were arrested, and they are now being prosecuted in the Magistrates Courts. Many have been acquitted because they should not have been arrested in the first place.

[The lowering of the threshold for serious disruption] is not working well, and it has given more powers to the police, which the police were not seeking in the first place, and unfortunately, when there are more powers, then inevitably they start to be used and perhaps not used appropriately. We are seeing a lot of resources going on these cases where in fact, prior to the Public Order Act 2023, these types of protests would have continued without any issue at all.”¹⁵³

Matt Parr, former Inspector at HMICFRS, also criticised the lowering of the threshold. He told us:

“What I did not recommend in my [2021 HMICFRS review], was that that bar went down quite as far as it has. My preference was ‘serious’ should be replaced by ‘significant’. The Home Office ended up defining serious as anything “more than minor” and that, frankly, is where the trouble started. The police were quite keen for clarity and some guidance on what ‘serious’ was. What they did not want and what they did not expect was what they got.”¹⁵⁴

David Spencer, Head of Crime and Justice at thinktank Policy Exchange, told the Committee that the fact the Met has been using the new definition for serious disruption put it in a difficult position:

“The current situation where the police find themselves is hugely challenging. I was actually in Scotland Yard when the divisional court handed down the decision and I can say - without going into too much detail in terms of who the people were - there were some, ‘Oh, that poses an interesting challenge for us’. This is really a very difficult situation for the MPS to find itself in. Again, a very difficult, cluttered legal regime.”¹⁵⁵

¹⁵² London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.2 & p.9

¹⁵³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.11

¹⁵⁴ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 1](#), 9 October 2024, p.12

¹⁵⁵ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.10

The Committee believes that the Met requires clarity on the status of these regulations. Protesters also require clarity, and clear communication from the Met on which definition of serious disruption is currently in force. Following the outcome of the pending legal appeal, the Met should issue clear and unambiguous guidance for those attending protests, setting out exactly what constitutes serious disruption, and how this has changed from the previous definition used.

Is stop and search being used for protest?

New legislation related to protest also introduced new offences. These include:

- Locking-on & being equipped for locking-on, which covers instances where an individual attaches themselves to another person, object or to land.
- Causing serious disruption by tunnelling/being present in a tunnel & being equipped for tunnelling.
- Obstructing major transport works.
- Interfering with key national infrastructure.
- Extended stop and search powers to allow police to search and seize articles connected with protest, and powers to stop and search without suspicion.¹⁵⁶

The table below shows that not all of these offences are being used by the Met in its public order work. However, it does show that powers to stop and search related to protest have been used.

POA 2023, Met uses of powers since their introduction in 2023 up until October 2024

POA 2023 power	Number of uses
New offences in Sections 1 and 2 related to locking on and being equipped to lock on	12
New offences in Sections 3, 4 and 5 related to tunnelling	0
New offences in Sections 6, 7 and 8 related to obstruction of major transport works and interference with national infrastructure	723
Powers in Sections 10 and 11 related to stop and search, and stop with and without suspicion, linked to protest-related offences	Section 10 - 12 uses in relation to locking on. Section 11 - Authority given on 3 occasions resulting in 49 searches ¹⁴¹

Source: Written evidence received from the Metropolitan Police

¹⁵⁶ See [Public Order Act 2023](#)

Both protest-related “with suspicion” and “without suspicion” stop and search powers have been introduced as part of the Public Order Act 2023.¹⁵⁷ The Act expanded existing stop and search powers that allow the police to stop and search if they have reasonable grounds (with suspicion) to suspect that a person is carrying a number of prohibited items. These include: drugs; weapons; stolen property; illegal fireworks; and articles that could be used to commit a crime.

Building on this, the Public Order Act 2023 allows police officers to stop and search if they have reasonable grounds to suspect a person has something made or adapted in relation to the protest offences (as listed above). These items could include, for example, glue, bike locks and various tools.

Under Section 60 of the Criminal Justice and Public Order Act 1984,¹⁵⁸ the police have the power to stop and search without reasonable suspicion. The Public Order Act 2023 introduced additional police powers to carry out protest related suspicion-less stop and search. Protest powers to stop and search without suspicion allow senior police officers (of or above the rank of inspector) to pre-authorise officers to stop and search any individual or vehicle if they “reasonably believe” protest-related offences may be committed within a specific area. This authorisation can only apply to a specified area and for an initial 24 hours, extending to 48 hours if authorised by an officer of or above the rank of superintendent.¹⁵⁹

These powers have been controversial. Jodie Beck, Liberty, told the Committee:

“One of the main issues with using stop and search in this context is because the prohibited items list for the protest-related offence is never-ending, so that could include a whole host of very innocuous objects. What we have seen to date is where that power has been used, it has captured people who were going to protest peacefully.”¹⁶⁰

[Protest related stop and search] has captured people who were just going about their daily lives so we can look at, for example, arrests at Royal Ascot for carrying nail glue.¹⁶¹

Jodie Beck, Liberty

Tom Southerden, Programme Director at Amnesty International, echoed Jodie Beck’s concerns. He added: “protest has become the only scenario outside of very serious violence where the

¹⁵⁷ See [Public Order Act 2023](#)

¹⁵⁸ See [Police and Criminal Evidence Act 1984](#)

¹⁵⁹ House of Commons Library, [Police powers: protests](#), 10 September 2024, p.24

¹⁶⁰ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.15

¹⁶¹ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.15

police can now use suspicion-based stop and search, and we say that that is the wrong approach to the legal framework around protest itself.”¹⁶²

The Committee questioned the Met on the use of stop and search at protests. Commander Louise Puddefoot told the Committee that the Met’s use of protest-related stop and search would be subject to scrutiny, and that it would be “transparent and accountable” in how it uses the powers.¹⁶³ However, no further detail was provided on what this transparency and accountability would look like in practice.

Given the concerns the Committee heard regarding the use of protest-related stop and search, the Committee would like to see a much more developed plan from the Met on how it will ensure that stop and search powers related to protest do not interfere with EHRC rights to peaceful assembly.

Should the Met be able to ban people from attending protests?

New legislation created provision for courts to impose constraints on individuals who have committed protest-related offences on at least two previous occasions.¹⁶⁴ These are known as Serious Disruption Prevention Orders (SDPO). Breach of an SDPO can result in a maximum sentence of six months imprisonment and an unlimited fine.¹⁶⁵ SDPO provisions came into force on 5 April 2024, with the first orders expected in 2025.

In written evidence to the Committee, the Met confirmed that as of October 2024, no applications for SDPOs had been made.

Professor Geoff Pearson, University of Manchester, questioned whether the framework exists to allow SDPOs to be used effectively. He told the Committee:

“SDPOs [...] borrow very, very heavily from FBOs [football banning orders] but ultimately, they will need that framework if they are to be effective, and as far as I see it at the moment, that framework does not exist. [...]

[FBOs] were introduced in the Public Order Act 1986 and they were almost completely useless for the first ten years of their operation because there was not the policing and intelligence frameworks to allow them to work. Then they started to be used rather

¹⁶² London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.16

¹⁶³ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing](#), 6 November 2024, p.33

¹⁶⁴ See [Part 2, Public Order Act 2023](#)

¹⁶⁵ Home Office, [Serious disruption prevention orders: statutory guidance](#), 5 April 2024

*indiscriminately and quite questionably. I would argue that it is only in the last ten years or so that we have actually seen FBOs being quite effective”.*¹⁶⁶

Tom Southerden, Amnesty International, questioned whether orders used for football policing were appropriate in a protest-related context:

*“it does not engage the same factors as a political protest situation. Due to the importance of political protests and how highly that is protected within the human rights framework, it is very hard for us to see how an SDPO could be justified as proportionate and necessary.”*¹⁶⁷

The Met do issue leaflets to protesters informing them of their rights during protests. However, it is not clear if these leaflets include detailed information for protestors on new powers and legislation, and how these will be used by the police.

The Committee recommends that further guidance for the public is required from the Met on the use of SDPOs, including specific guidance on how any planned use of SDPOs would be compatible with human rights protections. This is particularly important in light of the “more than minor” definition of serious disruption (subject to pending legal appeal), as the threshold for committing a protest-related offence is lower than has previously been the case.

Recommendation 10

The Government should issue clear public guidance on the status of the new threshold used for serious disruption following the conclusion of the legal appeal (National Council for Civil Liberties, R v Secretary of State for the Home Department [2024]).

Recommendation 11

The Met should issue comprehensive new guidance for the public within the next 12 months on how new protest policing powers will be used going forward, and how it will ensure the use of these powers doesn’t infringe upon protected rights to freedom of expression and assembly. This guidance should include specific sections on the use of Serious Disruption Prevention Orders and the use of stop and search in a protest context.

¹⁶⁶ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.12

¹⁶⁷ London Assembly Police and Crime Committee, [Transcript of Agenda Item 5 – Public Order Policing – Panel 2](#), 9 October 2024, p.12

Committee Activity

London Assembly Police and Crime Committee (formal meeting) – Wednesday 9 October 2024

Panel 1:

- **Matt Parr**, former Inspector, HMICFRS
- **Lord Walney**, Government Independent Adviser on Political Violence and Disruption
- **Kirsty Brimelow KC**, Barrister, Doughty Street Chambers

Panel 2:

- **Jodie Beck**, Policy and Campaigns Officer, Liberty
- **Professor Geoff Pearson**, Professor of Law, University of Manchester
- **Tom Southerden**, Programme Director Law & Human Rights, Amnesty International UK
- **David Spencer**, Head of Crime and Justice, Policy Exchange

London Assembly Police and Crime Committee (formal meeting) – Wednesday 6 November 2024:

- **Simon Hill**, Deputy General Secretary and Public Order Lead, Metropolitan Police Federation
- **Andy Walker**, Head of Delivery: Uniformed Policing, College of Policing
- **Louise Puddefoot**, T/Commander, Major Operations and Public Order, Metropolitan Police

The Committee also heard evidence on public order from then Deputy Mayor for Policing and Crime, **Sophie Linden**, at its Q&A on 17 July 2024, as well as from Assistant Commissioner (Met Operations) **Matt Twist** during its 11 September 2024 Q&A.

The Committee ran a survey to gather the wider experience of Londoners around public order policing. The survey was open for responses between Monday 2 September 2024 and Friday 22 November 2024. 38 responses to the survey were received.

Written evidence was received from:

- The Network for Police Monitoring
- College of Policing
- The Metropolitan Police
- The Metropolitan Police Federation
- Chris Hobbs, former police officer and contributor on public order for Police Oracle

Other formats and languages

If you, or someone you know needs this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: 020 7983 4100 or email assembly.translations@london.gov.uk

Chinese

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Email 与我们联系。

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Bengali

আপনি যদি এই দলিলের একটি সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں درکار ہو تو، براہ کرم نمبر پر فون کریں یا مذکورہ بالا ڈاک کے پتے یا ای میل پتے پر ہم سے رابطہ کریں۔

Turkish

Bu belgenin kendi dilinize çevrilmiş bir özetini okumak isterseniz, lütfen yukarıdaki telefon numarasını arayın, veya posta ya da e-posta adresi aracılığıyla bizimle temasa geçin.

Arabic

الحصول على ملخص لهذا المستند بلغتك،
فرجاء الاتصال برقم الهاتف أو الاتصال على
العنوان البريدي العادي أو عنوان البريد
الإلكتروني أعلاه.

Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ટપાલ અથવા ઇ-મેઇલ સરનામા પર અમારો સંપર્ક કરો.

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