



**METROPOLITAN  
POLICE**

# MPS UME POLICY

Operation Lakenvelder

Authors: T/Commander Ade Adelekan  
Chief Inspector Martin Kirby



## Contents

Introduction	Page 2
Policy Purpose	Page 2
Early Assessment & Intervention	Page 2
NDM – National Decision Model	Page 3
Information and Intelligence	Page 3
Terminology	Page 4
ATR - Assess, Threat, & Risk	Page 5
ATR – Assess, Threat & Risk Flowchart	Page 6
Powers and Policy	Page 7
Human Rights	Page 8
Criminal Justice & Public Order Act 1994	Page 9
Option Contingencies	Page 9
TAR – Take, Action & Review	Page 10
Doc: MPS Lakenvelder Policy Crimint Debrief	Page 10



## Operation Lakenvelder

# Unlicensed Music Events (UMEs) Prevention and Early Intervention

### Introduction

Instructions, advice and guidance for frontline officers and supervisors, intelligence teams, control room staff and senior leaders in respect of the operational interventions against, and investigation of, Unlicensed Music Events (UMEs), potential Unlicensed Music Events and any events that might present similar risks.

This information is Metropolitan Police Service (MPS) policy. Anyone who works for the MPS, including contractors and volunteers, must comply with it.

Operation LAKENVELDER is the overarching MPS Operation targeting UMEs and similar events.

### Policy Purpose

This policy has been compiled to deliver consistent and appropriate interventions to UMEs and similar events. While some of these events will pass off peacefully with limited impact upon the local community, attendees or others, it is often difficult to discern at the outset what impact is likely to result. To compound this challenge it is recognised that for those events that ultimately do cause disruption and harm, it is almost invariably the case that some sort of intervention by Police or partners at the outset is more effective and less risky to deliver than intervening at an event that has grown in scale and complexity.

Early Assessment and Intervention are Key

Furthermore it is important that Police and Partners recognise both the importance of, and their legal duties to, work to prevent UMEs and similar events from taking place. The Crime and Disorder Act 1998 places duties on “Responsible Authorities” (including Police and Local Authorities) for the creation of appropriate strategies for the reduction of crime and disorder and for combatting the misuse of drugs and alcohol. It is within this framework that local Community Safety Partnerships must prioritise mechanisms to prevent UMEs and similar events taking place and to effectively intervene when they do. Partners, particularly Local Authorities, have a range of resources and legal powers that they can employ as part of these local strategies.

UME Prevention is a Partnership Responsibility and should be a Key Priority of OCUs.



## The National Decision Model (NDM)

Given the challenges associated with defining these events decisions should be based on risk and reasonably foreseeable consequences.

The NDM is suitable for all decisions and should be used by everyone in Policing. It can be applied:

- to spontaneous incidents or planned operations
- by an individual or team of people
- to both operational and non-operational situations.

Decision makers should use the NDM to structure a rationale for what they did during an incident and why. Managers and others can use it to review decisions and actions, and promote learning. In the context of this policy, given the challenges associated with terminology and definitions (see below), it is important that the NDM is used as the basis for decision making around intervention types.



In a fast-moving incident, the police service recognises that it may not always be possible to segregate thinking or response according to each phase of the model. In such cases, the main priority of decision makers is to keep in mind their overarching mission to act with integrity to protect and serve the public.

### Information and Intelligence

The basis for Police interventions to this issue should be the established Core Functions of the Police Service:



- Protect Life and Property;
- Prevent and Detect Crime; and
- Maintain the Queens Peace

In the context of UMEs and similar events, doing nothing on receipt of information is not an option. At the very least this information needs to be rigorously assessed for risk by the Duty Officer. Given the wide variety of events that might come to police attention, it is important that each event is assessed on its circumstances and that available options for police intervention are considered.

**In all instances where an event is identified as creating Threat, Harm or Risk active consideration must be given to using appropriate legislation to intervene and disrupt, to arrest the organisers where necessary to do so, seize sound systems and recover evidence and criminally generated assets. Only by application of such a timely, robust and consistent approach can the public interest to protect vulnerable people and prevent harassment, alarm and distress to our communities be addressed in the immediate and longer term.**

### **Terminology**

Throughout this and other associated documentation there appear a number of differing terms in relation to these events. Some of these terms have been in use in Policing and some are reflected in legislation – many of these terms will not be familiar to the general public or to those who might wish to share information or intelligence about a potential event or an event in progress. Given this, it is important in the early stages of intervention that Police are not unduly focused on such definitions when deciding whether to respond to information. The overriding consideration should be one around reasonably foreseeable risks and impact on those the event affects and this cannot be properly assessed without appropriate investigation.

- **Unlicensed Music Events (UME)**

This is used in Policing as an umbrella term to describe a wide spectrum of events. These events may variously be advertised as “Raves” (see below), Street Parties, Block Parties, Barbecue Parties, silent discos etc. However, the precise legal meaning of the term UME is much narrower and refers to an event at which one or more licensable activities are taking place, and which requires a licence under the Licensing Act 2003. The flowcharts contained in the Appendix to this policy will assist officers in determining whether an event requires a licence under the Licensing Act 2003.

Whilst the term UME continues in use in Policing, it is important not to be too focused on the term when gathering information/intelligence and assessing threat/risk. It is also important to understand that some of the events that this policy seeks to provide an intervention for may **NOT** actually require Licensing under the Licensing Act. This does not mean that Police should not intervene in such events where they pose a risk.



- **Rave**

This is a term which was used by organisers of such events in the 1990s. The Criminal Justice and Public Order Act 1994, which was the legislation brought in to address these events, refers to “raves” in the section headings, but not in the individual provisions of that legislation itself. The events are described by reference to gatherings at which certain circumstances exist (playing of amplified music during the night and the number of persons attending etc.). Certainly in the case of most UMEs in Metropolitan Police areas, the term rave is not often used in advertising, promotional material or on social media. The term is still used in the promotion of some events in the open air away from urban locations.

- **Block Party (Barbecue Party, Street Party etc.)**

There is no accepted legal definition of such events nor can one be inferred; however, it is important that these terms feature in this policy because they are frequently used on social media, in leaflets and within other promotional material to advertise gatherings (mostly in urban areas) that ultimately **may** result in the sort of risks highlighted below. It is crucial that, for the purposes of intelligence scanning and making initial interventions, events that have been advertised or described in these ways are investigated in the same way that any other UME would be. Of course community and larger family events in streets, estates, parks etc. happen frequently (particularly in the summer) and most will not require the use of Police powers or other interventions. However without an investigation and assessment led by the BCU Duty Officer, opportunities will be missed to intervene in events that later go on to become far more disruptive, risky and challenging to Police.

### **Assess Threat and Risk**

It is important to understand that these events sit within a spectrum of events that may be described in a variety of different ways.

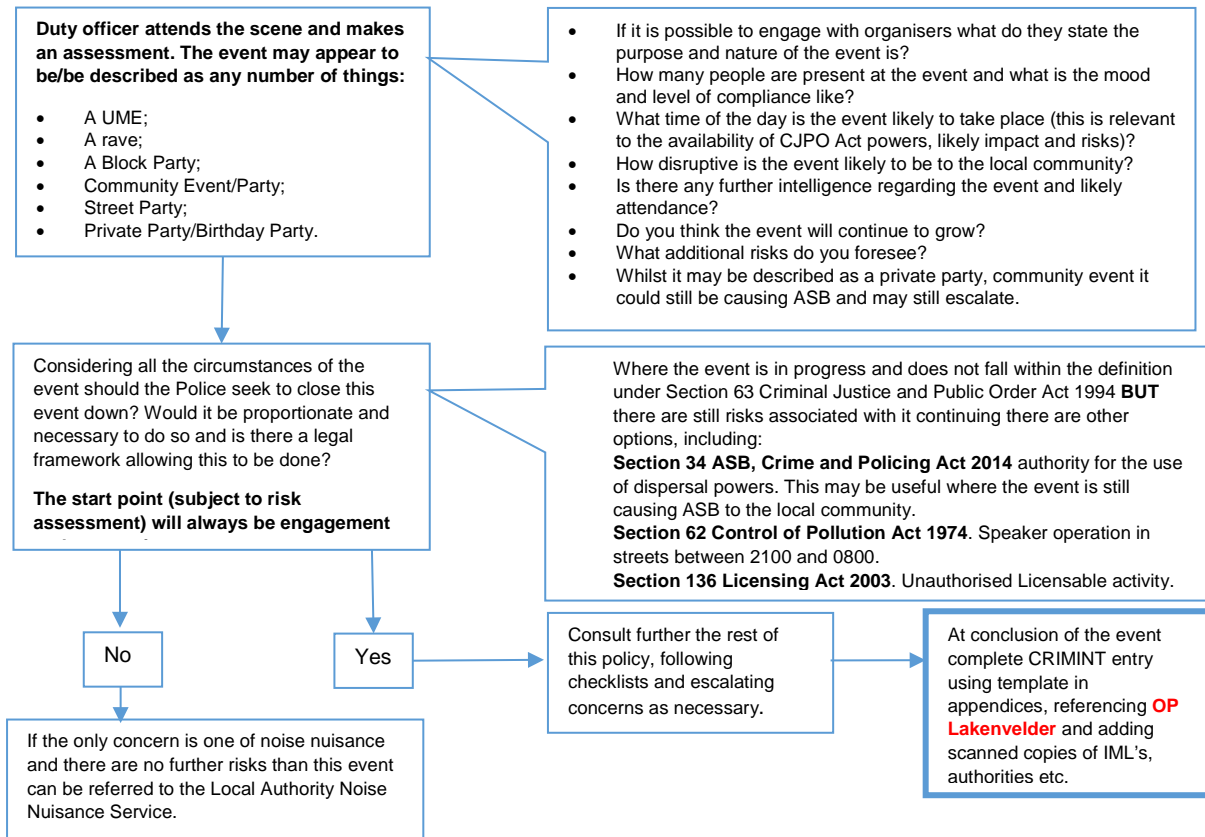
In determining how to intervene, it is important to understand that at the upper end of this severity spectrum these events can, and frequently have, generated significant risks and have resulted in:

- The commission of serious sexual offences;
- Significant safeguarding issues for attendees and those in the immediate area – particularly children, young people and the vulnerable;
- The use of illegal and dangerous drugs – with notable cases involving serious harm and death to those consuming them;
- Violence and disorder, including the use of knives and firearms;
- Unlicensed and uncontrolled alcohol sales and consumption;
- The presence and operation of criminal gangs;
- A difficult and dangerous operating environment for Police officers and other Emergency Services (with numerous notable examples of Police Officers being seriously injured while responding to UMEs);
- Protracted disruption for the local community, landowners and businesses;



- Damage and environmental crime and clean up expenses to those responsible for the upkeep of the relevant space.

**Intelligence or Information received regarding a UME or Potential UME in progress or imminent at an identified location**



It is against these Police risks that the Police and Partner interventions must be assessed. It is therefore important that **in all cases** of either:

- Intelligence received regarding an upcoming event of this nature,
- Reports of a possible UME in progress, or
- The recognition that a particular site, building or area is prone to or vulnerable to use as a UME location,

that Police and, where appropriate, Partners **ALWAYS take action to mitigate the risks**. This action can range from target hardening to engagement (either directly or through Community networks and representatives such as Independent Advisory Groups or Neighbourhood panels) through to the use of Police powers and significant Police resources to bring to an end such an event. The tactics used will depend upon a number of factors and this policy documentation will aid in this decision making.



Record keeping in an appropriate log (IML, Public Order Log etc.) is important to ensure decisions and rationales are auditable subsequently.

**Where an event poses serious risks (safeguarding, drugs, violence etc.) and/or has a likely effect of causing harassment, alarm or distress to the community there is an expectation that Police will intervene and use all reasonable means and powers to close down the event.**

**Where the event presents in a different character (for example private parties, BBQ parties, Block parties etc.) or perhaps appears to be smaller and less impactful in nature, an assessment MUST still be made.** Below is a list of relevant factors that may assist in forming a judgment regarding appropriate Police interventions (particularly where for example the event does not fit the definition of a gathering under section 63 Criminal Justice and Public Order Act 1994 – meaning these powers are unavailable).

This is not exhaustive and will vary according to the circumstances. It is necessary to strike the right balance between our positive duty to carry out our core functions as a police service, minimise disruption to our communities and the need to ensure proportionate and consistent decision making. The confirmation of aggravating circumstances, having considered the factors below, will be indicative of an event which may require Police intervention to close the event down:

- The nature of the site at which the event is happening or is planned. How disruptive is an event likely to be to the local residents, businesses etc.?
- How large is the event and how is it advertised? Is it likely to grow and attract others – might it go beyond the organisers original intentions?
- Are there any gang links to the event and the location?
- Is there any intelligence regarding this event or similar recent events that would heighten concerns?
- Is there evidence of drug and alcohol use?
- Are there obvious health and safety risks to the attendees/others?
- Activity is contributing or likely to contribute to members of the public in the locality being harassed, alarmed or distressed or the occurrence of crime and disorder is likely.
- Are there children present, or others who appear vulnerable?

### **Powers and Policy**

**Interventions by Police and Partners can take place at the following stages:-**

- **Prevention, target hardening, problem solving and local engagement:** Ownership for the delivery of this activity and the creation of the relevant mechanisms for this rests with the local BCU Commander and partners. Please refer to the Lakenfelder Partnership Protocol for further information; this is contained in the Appendix to this policy;



- **Information or Intelligence of a planned event where the BCU location is not known:** Ownership of this scenario sits with MO2 and MO6 SLT until such time as the location becomes known;
- **Initial interventions against an event where the BCU location is known or suspected (either planned or underway):** Ownership here sits with the local BCU until such time as the event becomes too complex or large scale.

**Once the decision has been made for police to intervene it is crucial that officers use the correct powers to ensure that their interventions are lawful.**

The Flow Charts of Powers and Schedule of Legislation contained within the supporting documents to this policy will assist officers in ensuring that the correct powers are used.

### **Human Rights Considerations**

When making assessments and decisions regarding whether/how to intervene in an event officers should have due regard to, in particular, the below provisions of the ECHR, which are enshrined by the Human Rights Act 1998. These considerations should be recorded and rationales must reference the balance of human rights considerations (of those involved) against the impact of the event on vulnerable people and the wider community. The elements highlighted in grey should be referenced when making decisions that impact upon either of the below rights.

#### **Article 8 of the ECHR (Human Rights Act 1998) - Right to respect for private and family life:**

- Everyone has the right to respect for his private and family life, his home and his correspondence.
- There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

#### **Article 11 of the ECHR Freedom of Assembly and Association:**

- Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests.
- No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others.



## **Criminal Justice and Public Order Act 1994**

Along with the Licensing Act 2003 and the Anti-Social Behaviour Crime and Policing Act 2014, this is one of the key pieces of Legislation for enforcement and event prevention. The term “Rave” is contained in the headings of these provisions, but the powers under sections 63 to 65 of the Act could apply to any event within the spectrum (traditional rave, street party, block party, barbecue party etc.) where the event has the required characteristics.

### **Sections 63(1) Criminal Justice and Public Order Act 1994:**

- describes ‘a gathering on land in the open air of 20 or more persons (whether or not trespassers) at which amplified music is played during the night (with or without intermissions) and is such as, by reason of its loudness and duration and the time at which it is played, is likely to cause serious distress to the inhabitants of the locality’.

### **Section 63 (1)(A) (as amended by Section 58 of the Anti-Social Behaviour Act 2003)**

- Also applies to a gathering of 20 or more persons who are trespassing on land which is not in the open air (i.e. within a building) for a rave and where amplified music is played at night. This covers events such as “warehouse raves”.

### **Under Section 63(9) of the Act**

- The above provisions specifically do not apply to events that are licensed by the Licensing Authority. Section 1(1) (c) of the Licensing Act 2003 provides that Regulated Entertainment must be licensed.

Importantly, whilst an event carried out in accordance with a licence will fall outside of the Section 63 Criminal Justice and Public Order Act 1994 provisions, it does not necessarily follow that an unlicensed event automatically falls within section 63 CJPOA 1994.

## **Options and Contingencies**

**The Policy Checklists contain directions and guidance in relation to the following key roles:**

- BCU Duty Officer
- BCU Neighbourhood Policing Team Inspector
- On Call FLP SLT
- BCU Commander
- MetCC Supervisor
- Met Grip Chief Inspector
- MO2 BCU LIT
- MO2 Public Order Intelligence Unit
- MO2 Open Source
- MO6 SLT



### Take Action and Review

Where offences are committed during the event or whilst it is being closed down, post incident investigations should be conducted to ensure offenders are brought to justice and that organisers (who are frequently involved in repeat events) can be prevented from continuing to run these events that can so harm our communities, neighbourhoods and the vulnerable.

Secondly, developing a comprehensive intelligence picture of past and future events is important to help us to hone interventions. Finally, these events can be tactically very difficult to resolve and it is important that we learn from each event and that debriefs are held with those involved.

There are also specific responsibilities for BCU Commanders to ensure local mechanisms exist to encourage and share learning, capture intelligence and brief Partners of the risks often associated with these events.

The completion of an **Op Lakenvelder Crimint** (template included in appendices and attached below) is crucial. This Crimint also serves as a suitable location to save relevant documentation and to describe the nature of the incident.



MPS Lakenvelder  
Policy Crimint Debrief