

Operation Hotton

Learning report

Warning: this report contains offensive language

> Foreword by Sal Naseem, Regional Director

Trust and confidence.

Two words we hear at present in the context of policing. Both are intrinsic to our mission in improving public trust and confidence by ensuring the police are accountable for their actions and equally importantly, that lessons are learned.

Discrimination was brought to the forefront of public discourse by the Black Lives Matter movement. More recently, the kidnap, rape and murder of Sarah Everard by a Metropolitan Police Service (MPS) officer has sparked further concerns about misogyny within policing, and violence against women and girls.

Both issues go to the very heart of public confidence in policing.

We are now making 15 recommendations for the MPS to change policing practice after our Operation Hotton investigations found evidence of discrimination, misogyny, harassment and bullying involving officers predominantly based at Charing Cross Police Station.

Our recommendations seek to tackle a range of issues, which if not addressed, can lead to the creation of environments in which unprofessional and inappropriate conduct can thrive and go unchallenged.

Policing in the United Kingdom is by consent, which means the trust and confidence that the public has in the police service is critical. The behaviours we uncovered risked causing serious damage to that relationship.

Although the matters we investigated occurred three years ago, we know through our independent investigations, the communities we engage with and concerns raised by officers and the wider public, that these were not isolated incidents.

Many of the inappropriate messages we found during Operation Hotton were exchanged on social media platforms. We have previously highlighted concerns about that and we wrote to the National Police Chiefs' Council in April last year asking them to remind forces and officers of their obligations under the police Standards of Professional Behaviour.

This learning report contains examples of messages with language which is offensive – and some may find it upsetting. However, we felt it was important to provide the context for the public, the MPS and other forces, for why such wide-ranging recommendations are necessary.

We welcome steps already taken by the MPS, alongside new initiatives, addressing some of the cultural issues we found during Operation Hotton. These include its Rebuilding Trust plan focusing on standards, culture and women's safety; strengthening of its whistleblowing line through the Raising Concerns policy; and the STRIDE 25 strategy and action plan for inclusion, diversity and engagement.

However more needs to be done. The recommendations we are making to the MPS focus on the cultural issues identified and are aimed at ensuring that those who work for the force feel safe with their colleagues, and the communities they police feel safe with those who are there to protect them.

We are grateful to those officers who were brave enough to speak to us about their experiences, realising that in doing so they risked further bullying. That took courage. Hopefully this learning report and recommendations will give officers the confidence to come forward in the knowledge that people are listening, and changes will be made.

The MPS has to enjoy the trust and confidence of its own officers from diverse communities before it can hope to bridge the gap in trust and confidence with the communities it serves.

> Overview

1. Operation Hotton was a series of nine linked independent investigations concerning serving police officers from the Metropolitan Police Service, (MPS). Most officers held the rank of police constable and were predominantly based at Charing Cross Police Station. The majority of the officers worked on teams formed to deal with high levels of public disorder, theft, touting, drug dealing and violence in the West End.
2. Below is a summary of the allegations investigated as part of the investigations.

Operation Hotton	Summary of the investigation	Outcome
Strand 1	The alleged bullying, sexual harassment and harassment of a female officer by subject officer 1.	1 x Officer found guilty of Improper use of public electronic communications network (Section 127 of the Communications Act 2003) Officer dismissed and placed on barred list
Strand 2	The failure to report, challenge, or appropriately deal with the allegation of bullying, sexual harassment and harassment alleged in Strand 1.	3 x Misconduct proven. (1 x Written warning, 2 x No Further Action)

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Strand 3	The allegation that a police officer had sex in a police station with a drunk person. The allegation that officers failed to report or challenge this alleged conduct.	Main allegation regarding sex in a police station not proven 1 x Misconduct proven (Management Action)
Strand 4	Allegations concerning a police officer assaulting his partner, misogynist behaviour/actions and drug use.	2 x Gross Misconduct proven (Both officers on barred list)
Strand 5	Allegations concerning the use of steroids by officers, and the failure by officers to challenge or report this.	1 x Misconduct proven (Management Action) 1 x Gross Misconduct proven (Officer on barred list)
Strand 6	This investigation was discontinued. Due to the sensitive nature of this investigation details are not included in this report.	No Further Action
Strand 7	The allegation that officers deliberately deleted material that was relevant to an ongoing criminal investigation.	1 x Gross Misconduct proven (Officer on barred list)
Strand 8	Allegations concerning discriminatory actions and behaviours identified from WhatsApp messages.	2 x Gross Misconduct proven (Both officers on barred list) 6 x Management Action
Strand 9	Allegations that two officers engaged in sexual activity while on duty, officers engaged in conversations that were discriminatory in nature, and officers slept while on duty.	1 x Misconduct proven (words of advice given) 1x Officer resigned prior to misconduct investigation completion

3. Each of these strands has its own final report that deals with the alleged conduct. A combined summary of those reports has been published on our website. However, throughout the course of the investigations, we became concerned about cultural and structural issues that created an environment in which the conduct matters identified were cultivated and were able to breed.
4. As a result, we reviewed evidence across the strands of Operation Hotton and spoke with a number of police officers who came forward to share their experience with us following an internal witness appeal.
5. The team at Charing Cross where we identified these problems has now been disbanded, yet we have seen evidence of this behaviour in subsequent investigations. We believe these incidents are not isolated or simply the behaviour of a few 'bad apples'.

6. We found multiple concerning behavioural themes about the attitudes and behaviour of police officers that ran through the investigations:
 - bullying and aggressive behaviour
 - ‘banter’ used to excuse oppressive and offensive behaviours
 - discrimination
 - toxic masculinity, misogyny and sexual harassment
 - challenging and reporting improper conduct
7. We also found several structural issues relating to working practices that helped enable the troubling behaviour to go unchecked:
 - nature of work
 - shift patterns
 - isolation
 - supervision
 - acting up/ unofficial promotions
8. An underlying culture allowed conduct issues to permeate and behavioural problems went unchallenged.
9. To address these issues, we have issued 15 learning recommendations to the MPS. Prior to issuing these recommendations we consulted with the MPS who provided information on work that has taken place or is under way in relation to our findings. The consultation period was used to revise the recommendations and make them more focussed so they could assist and supplement the good work that is already being carried out, with the overall aim of supporting the MPS to make meaningful progress on these areas and restore public confidence.
10. The learning recommendations have been set out by thematic area. For some, more than one recommendation has been made to address the issues identified. There is no learning recommendation for ‘shift patterns’ as through the consultation period we are satisfied the MPS have already addressed this.
11. The evidence to support the learning recommendations has been set out below each thematic area. This includes some of the actual exchanges between the officers. It is recognised that some of the language used in these exchanges may cause shock and discomfort, however, they have been included to give full context to the recommendations and so the public and stakeholders can be clear about why we have made them.

> Learning Recommendations

> Bullying and Harassment

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Recommendation 1:

The IOPC recommends that the MPS should take appropriate steps to assure itself that the bullying and harassment identified through Operation Hotton is not more widely prevalent across the MPS.

Recommendation 2:

The IOPC recommends that the MPS ensures those investigating allegations of bullying and harassment are adequately detached and independent to avoid potential conflicts of interest and to build confidence.

Recommendation 3:

The IOPC recommends that the MPS ensures there are metrics in place to measure and demonstrate, in a transparent way, improvements made in tackling bullying and harassment and confidence in the MPS approach to this. This could include reporting on the outcomes of allegations by protected characteristics. Consideration could also be given to the involvement of staff associations in reviewing grievances at a strategic level.

Recommendation 4:

The IOPC recommends that the MPS should build on the steps it has taken internally against bullying and harassment, by publicly committing to a position of zero-tolerance on bullying and harassment, which is embedded through messaging, guidance, training and on-going support for police officers and staff to proactively and robustly challenge such behaviour.

Supporting evidence and rationale:

12. An Operation Hotton investigation into allegations of bullying and harassment along with the internal witness appeal, found pervasive evidence of such behaviours, involving officers predominantly working in teams based at Charing Cross Police Station. These included demeaning and intimidating actions towards police officers on probation, such as beckoning them with a bell, and threats to cut their hair and belongings¹; officers being shouted at by supervisors; and women being sexually harassed or treated as a “*weary female*” when speaking out about the behaviours of male colleagues. The culture of bullying appears to have been accepted and not challenged. A reason for not reporting such behaviour was a lack of confidence that it would be dealt with effectively and fear of repercussions. In one case, allegations of bullying were not dealt with effectively or promptly by the supervisor who was in a relationship with the person making the allegations.
13. The recommendations related to ‘Bullying and Harassment’ were made to address the issue we identified. Recommendation 2 was made to ensure those investigating allegations of bullying and harassment are independent of the matter which we hope will provide more assurance to those making the reports that it will be dealt with appropriately and, may build confidence in the system and encourage reporting. Ultimately, this may reduce instances of such behaviour.
14. Recommendation 3 has been made, as measurement and reporting relating to bullying and harassment and the confidence in the MPS approach will enable insight into where

¹ The behaviour towards the probationers is understood to have taken place at Belgravia Police station.
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improvements are being made and where there is still work to be done; providing transparency and enabling accountability. Reporting on outcomes by protected characteristics can help identify any trends regarding disproportionality and there may also be opportunities to work more closely with staff associations to identify areas for improvement and embed changes. This recommendation has been informed by feedback received from the Chair of the National Black Police Association.

15. Recommendation 4 has been issued as the IOPC believe it is important that the MPS adopt and announce an organisational position of zero-tolerance which would reflect the MPS view that bullying and harassment is not acceptable in any circumstance and provides a clear and simple message on this for officers, staff and the wider public. A clear expectation needs to be set that evidence of bullying and harassment will never be ignored or accepted, and always challenged and dealt with proactively and robustly, and officers and staff will be protected from being subject to these behaviours. Messaging, guidance, training and on-going support would all be important in embedding a zero-tolerance position and creating a culture where police officers will feel empowered to report and challenge such behaviour and be supported in doing so.

> Banter

Recommendation 5:

The IOPC recommends that the MPS should review and ensure the adequacy of its current training and guidance on the appropriate use of social media, including duties under the Code of Ethics that extend to officers' private lives. In particular, ensure all officers and staff conform to the expectations of their behaviour under the Code of Ethics; make clear that information posted by officers and staff on social media platforms should conform to these guidelines; and that privacy is not a defence to discreditable conduct. Further, it should make clear that deleting offensive or derogatory material from digital devices is not a suitable method to avoid disciplinary action.

Recommendation 6:

The IOPC recommends that the MPS should review and ensure its current training and guidance on bullying and harassment adequately covers when remarks that may be viewed by some as 'friendly' banter, can create an intimidating, hostile, degrading, humiliating or offensive environment for others, and therefore be seen as 'ignorant' or 'malicious' banter by others.

Supporting evidence and rationale:

16. The Operation Hotton investigations found evidence of messages exchanged between police officers that were often highly sexualised and/or violent and discriminatory were generally described as 'banter' by police officers in their defence. When the behaviour was challenged by their supervisors, the use of the word 'banter' in defence was accepted, allowing the sender to get away with the bullying.
17. Malicious comments were a frequent part of the bullying. This was downplayed as "*friendly banter*" or "*laddish banter*," so it was not dealt with. However, we found that too often 'banter' was used to excuse offensive and discriminatory behaviour and undermined those who did not participate or found it unacceptable. They were also undermined as not understanding or

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being able to handle such comments. Accepting such messages as ‘banter’, led to inaction, allowing the culture to permeate and persist, whilst those on the receiving end felt harassed and that they had to accept it to avoid feeling humiliated and ostracised.

18. The type of communication considered as ‘banter’ by some, included:
 - Messages about police officers attending a festival dressed as known sex offenders and a molested child (sent within a WhatsApp group containing 17 police officers).
 - numerous messages about rape and ‘raping’ each other (examples sent within the same group as above containing 17 police officers, also within another WhatsApp group containing 19 police officers, and within a Facebook chat group containing four police officers).
 - Homophobic comments such as “Gayyyyyy”, “You fucking gay!” and “Fuck you bender...🤔🤔”
 - subject officer 1 sent messages saying “I would happily rape you”, “if I was single I would actually hate fuck you” and “if I was single I would happily chloroform you”
 - use of words that could be considered misogynist, racist, or constituting disability discrimination (see further details within the sections titled ‘discrimination’ and ‘toxic masculinity and misogyny’)
19. When we spoke with victims who challenged perpetrators about their experience, they told us that there appeared to be attempts made to push any comments or behaviour into a ‘grey zone’. This meant that everything that happened in this zone was reduced to being banter, or a joke or game, or it was just a misunderstanding. This process of pushing things into a grey zone allows perpetrators to get away with their behaviours, and acts to undermine or disregard the legitimacy of those who are subject to the bullying, misogyny and/or discrimination.
20. The IOPC recognises that police officers perform a difficult job and sometimes humour, or ‘banter’ are used as coping mechanisms to respond to difficult situations. However, given the reports of bullying, the volume of conduct issues, the witness accounts and accounts under caution given by police officers, it appears that too often the officers we investigated were using ‘banter’ to excuse unacceptable behaviour.
21. Police officers are required to adhere to professional standards of behaviour at work and in their private life. The behaviours identified indicates that clarity is needed around officers being held to a higher standard than members of the public, even in their private lives and a distinction of what is acceptable behaviour and what constitutes ‘malicious banter’ is required.
22. By recognising that the term ‘banter’ can be used inappropriately to describe behaviour that is malicious and/or ignorant and by not tolerating the term as an excuse for unacceptable conduct, those on the receiving end of it or who witness it may feel empowered to be able to challenge it and feel supported in doing so.

> Discrimination

Recommendation 7:

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The IOPC recommends that the MPS should assure itself that it is taking sufficient steps to eradicate racism from the force, ensuring continued progress against learning recommendations issued by the Macpherson Report and with specific measures to demonstrate improvements. As part of their ongoing work to build community confidence, the MPS should commit publicly to being an anti-racist organisation with a zero-tolerance position on racist behaviour.

Supporting evidence and rationale:

23. The Operation Hotton investigations found evidence of communications discriminatory and offensive in nature. Black and Asian police officers spoke of being ostracised. We found messages that evidenced repeated mocking of non-Christian religions, the Black Lives Matter movement, people with disabilities, racism and homophobia.
24. These included:
- *“Just walked past the big mosque all the fanatics turn up at to radicalise the young muslims....”*
 - *“My dad kidnapped some African children and used them to make dog food.”*
 - *“PWPEHCLM - People with pre-existing heart conditions lives matter. Should of offered him a kit kat and a nice lie down. Murdering cunts.”*
 - *“Bring all the lefties I say, we can sing “cum by ya” and embrace our multi gender/ethnic and sexual backgrounds whilst denouncing all the fascists in the MET...yay for Xmas partied [sic]...except of course that's a Christian celebration and I believe in ALL religions so it's not on!! Stick to our own... 😊”*
 - *“Some uniform or plain clothes work on Somalian rats... I battered one the other day...weighed less than [police officer's name].”*
 - *“Opened my balcony door and loads of flies flew into the front room. So I got the fly spray and turned my gaff into Auschwitz.”*
 - A police officer sent another officer an image of a Black man wearing a white shirt. His colleague asked, *“What's good about it I don't get it lol.”* He replied, *“Ignore the robber...I like the shirt.”*
 - Use of derogatory terms about people with disabilities, including *“spastics”* and *“retard”*.
25. One police officer was referred to as *“mcrapey raperson”* in a WhatsApp exchange. When officers on his team were asked to provide an explanation for this nickname, it was explained that there were rumours about him bringing a woman back to the police station to have sex with. Others reported it related to his *“particular fondness of IC3 and IC4.”*² A further officer clarified that he thought the nickname related to *“harassing them [women], getting on them, do you know what I mean being like, just a dick.”*

² IC3 and IC4 are identity codes used by the police to describe a person's apparent ethnicity. IC3 is the identity code for Black and IC4 is the identity code for Asian.
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26. The messages shared between officers pertain to negative racial, disability, sexist and religious stereotypes that are both harmful and offensive and suggest that some officers hold discriminatory views. Evidence also suggests that these attitudes may be reflected in their behaviour as there were reports of bullying towards Black and Asian officers.
27. Evidence suggested that the behaviour we found was absorbed into the culture of teams and negatively impacted those who belong to the minority groups affected or did not share the views. A culture developed that made it difficult to challenge oppressive comments and behaviour, and an environment that was hostile and felt unsafe for those who were the direct or indirect targets of the discrimination.
28. The casual exchange and blasé nature of this communication indicates a culture where officers were comfortable to make these comments, suggesting it was part of a status quo rather than an exception to the norm, the messages appeared to be sent without fear of repercussion or consequence.
29. The evidence found by the IOPC could bring the police service into disrepute and undermine public confidence in the MPS and further undermine public confidence and support the picture of unfair treatment of Black, Asian and Ethnic Minority (BAME) groups by the police. Exposure of these communications and behaviour is likely to impact on BAME groups the most, who already have low confidence in the police. Therefore, it is imperative that these sorts of behaviours are addressed and the MPS set clear standards that this is unacceptable.
30. Given the diverse communities served by the MPS, communications of this nature are deeply concerning as they may reflect officers' attitudes and their ability to police communities sensitively and impartially. The seriousness and frequency of such comments that went unchallenged suggested a systemic cultural issue that allowed the behaviour to pervade and persist. Therefore, it is our view that the MPS must publicly take a zero-tolerance approach to the discrimination and weed out this behaviour to try and restore trust from the public and their own officers that it is not acceptable.

> Toxic masculinity, misogyny and sexual harassment

Recommendation 8:

The IOPC recommends that the MPS should take steps to eradicate sexism and misogyny from the police force and commit publicly to a position of zero-tolerance. This should include reviewing its current policies, training and guidance on bullying and harassment to ensure they adequately cover how toxic masculinity, sexism, and misogyny can create an intimidating, hostile, degrading, humiliating or offensive environment for others. Training should include how police officers and staff can challenge such behaviour, as well as specialist training for supervisors.

Recommendation 9:

The IOPC recommends that the MPS should review how it deals with internal reports of sexual harassment, including how the Directorate of Professional Standards should engage with victims, seeking their views about designating them as persons entitled to

information during the investigation to ensure a victim centred approach, and include appropriate support and updates regarding their allegation.

Supporting evidence and rationale:

31. An Operation Hotton investigation found evidence of a culture of 'toxic masculinity', sexual harassment and misogyny. During the investigation, the IOPC found evidence of teams dominated by 'macho' officers using discriminatory, misogynistic and offensive language. When challenged by colleagues, those who reported the behaviour were ostracised, harassed and humiliated.
32. Toxic masculinity is comprised of *"ideas about the way that men should behave that are seen as harmful, for example the idea that men should not cry or admit weakness"* and *"defines manhood very narrowly in terms of violence, sex, status and aggression."*³ Such views prevailed alongside misogynistic views and sexual harassment. Police officers spoke of dominant macho officers, bragging about sexual activity. For example, there was an officer described as *"a bit of a ladies man, who would chase and harass women"*, and that *"there was a 'be careful when he's around' kind of atmosphere."*
33. We found numerous messages about domestic violence, plus sexually explicit, misogynistic and demeaning conversations:

A WhatsApp conversation between two police officers:

- Officer 1: *"And my bird won't stop taking the piss. Swear to got [sic] I'm going to smack her 😏"*
- Officer 2: *"Slap her one...say you didn't"*
- Officer 1: *"I'll fucking do it. She`s fucked off home."*

A separate WhatsApp conversation between two police officers:

- Officer 1: *"I fucking need to take my bird out, won't see her until next Saturday. Then I have to work. Promised to take her out the Friday after. Making it up to her from when I backhanded her"*
- Officer 2: *"Grab her by the pussy"*
- Officer 1: *"You ever slapped your missus?"*
- Officer 1: *"It makes them love you more. Seriously since I did that she won't leave me alone. Now I know why these daft cunts are getting murdered by their spastic boyfriends. Knock a bird about and she will love you. Human nature. They are biologically programmed to like that shit."*
- Officer 2: *"Lmao"*
- Officer 1: *"I'm right though"*

A further WhatsApp conversation between two police officers:

³ Definition of toxic masculinity from the Cambridge Advanced Learner's Dictionary & Thesaurus © Cambridge University Press.
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- Officer 1: *"I had that massive fight with my bird because she found out I'd been out on the piss with this girl who's a high class hooker a couple of weeks ago Hahahah"*
- Officer 1: *"Make friends with high class hookers"*
- Officer 2: *"I had one in Watford from adult work.⁴Used to fuck her all the time"*
- Officer 1: *"Yes! Hahaha"*
- Officer 2: *"used just hang out and blast her on the sly"*
- Officer 2: *"when I was on roids⁵ and needed it every hour"*

Messages sent by a male officer to a female officer:

- *"I would happily rape you"*
- *"if I was single I would actually hate fuck you"*
- *"if I was single I would happily chloroform you"*

Further messages sent about women, include:

- *"Getting a woman in to bed is like spreading butter. It can be done with a bit of effort using a credit card, but it's quicker and easier just to use a knife."*
- *"Fuck knows what she's on about I just wanna spuff on her" (sent by an officer in reference to another police officer's girlfriend).*
- *"Mate my Mrs is driving me mad - come and shag a baby into her it might shut her up bro 😂😂😂😂👊👊👊👊👊"*

34. Not all the police officers in the team shared these views. However, we found evidence that police officers were afraid of speaking out. Several spoke of how when people spoke out about this behaviour, they were harassed, humiliated and excluded. Challenging sexual harassment led to additional problems.
35. Female officers told us they would be treated as the *"weary female,"* told it was part of police culture, that they should accept, *"play the game or stay quiet"*, or leave. We also obtained evidence that reports of sexual harassment were not dealt with sensitively within the MPS.
36. There was also evidence that women who reported their experience of sexual harassment felt unsupported by those from who they should have expected care including a lack of information about investigations. Victims of crime are designated with important rights under the Victims Code during criminal investigations, however these rights and entitlements are not mirrored for police officers who are victims of misconduct by their colleagues. This means that they are not provided with a right to engagement and information during investigations which arise from their allegations. Whilst the MPS Grievance Policy stipulates that aggrieved persons reporting bullying and harassment at work should be involved in the investigation and receive regular updates, it does not stipulate how often. The MPS Behaviour at Work policy links to information about DPS but that does not include

⁴ The reference to *"adult work"* is believed to be a reference to an online prostitution service.

⁵ The reference to *"roids"* is a common abbreviation for anabolic steroid use.

information about how victims will be engaged, consulted, updated nor supported during misconduct investigations.

37. It is recognised that reporting a colleague comes with significant personal risk and knowledge of colleague's poor experiences who have done the same can prevent other victims from coming forward and embolden perpetrators to continue their behaviour.
38. The evidence found by the IOPC could bring the police service into disrepute and undermine public confidence in the MPS, as it could be seen as a reflection of how male officers may respond to the women they come into contact with during the course of their duties.
39. Adopting and announcing an organisational position of zero-tolerance would reflect the MPS view that sexism and misogyny has no place in policing and provides a clear and simple message on this for officers, staff and the wider public. A clear expectation needs to be set that evidence of sexism and misogyny will never be ignored or accepted, and always challenged and dealt with proactively and robustly, and officers and staff will be protected from being subject to these behaviours. Messaging, guidance, training and ongoing support would all be important in embedding a zero-tolerance position and creating a culture where police officers will feel empowered to report and challenge such behaviour and be supported in doing so.

> Challenging and Reporting Improper Conduct

Recommendation 10:

The IOPC recommends that the MPS should review and ensure the adequacy of its current training and guidance on the requirement by police officers to report, challenge or take action against the conduct of colleagues. This should include the responsibilities under the College of Policing Code of Ethics, available routes of reporting and the support available for those who report wrongdoing.

Recommendation 11:

The IOPC recommends that the MPS should take steps to ensure that when it has been identified that an officer has failed to report or challenge improper conduct, whether or not misconduct processes are initiated against that officer, appropriate steps are taken to understand the reasons from a learning perspective.

Supporting evidence and rationale:

40. During the course of the Operation Hotton investigations, it became apparent that there was a reluctance to challenge inappropriate behaviour and misconduct, despite one of the standards of professional behaviour for police officers and police staff being a requirement to *"report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour"*. We were provided with limited evidence from others who worked as part of the impact teams, albeit due to the working patterns it would seem they may have some awareness. There may be a variety of reasons why this might be the case.
41. Reasons provided to the investigations team, as to why behaviour was not reported included people feeling it would not be dealt with effectively; they were ostracised and feared repercussions; they would be labelled a 'grass' and felt unsupported. Other officers spoke of

loyalty, and a 'them and us' culture. The use of the term 'grass' was evidenced in some of the officers' communications. Including comments "*There's a few of those grassing c***s I would like to knife*", "*grassing is dirty*" and "*I've made it the no grassing no shit of anyone team...it's my f***king baby*".

42. The failure to challenge and report improper behaviour has a huge impact in terms of dealing with bullying, harassment, misogyny sexual harassment and discrimination experienced by other officers. In order to tackle these disturbing behaviours, the failure to report and challenge improper behaviour needs to be recognised as a key part of the cultural issues preventing progress. Without recognising this, these behaviours are likely to remain prevalent. Officers need to feel they are supported when they do come forward.
43. Recommendation 11 has been issued, as it is believed by seeking the rationale for police officers' failure to report improper conduct, it can identify areas for improvement, where officers have felt unable to report so this can be addressed.

> Nature of work

Recommendation 12:

The IOPC recommends that the MPS should review whether frontline roles, particularly response policing of busy areas such as Leicester Square, are assessed as roles which carry greater risk of stress and trauma and apply the College of Policing psychological risk management guidance, 2017.

Supporting evidence and rationale:

44. The IOPC received evidence from police officers of how difficult policing the area was - the atmosphere was tense, many members of the public were highly intoxicated, and aggression and violence were commonplace. The evidence demonstrated that this was extremely stressful and could lead to a 'them and us' environment.
45. College of Policing guidance recognises that particular roles within policing carry a greater risk of exposure to stress and trauma and suggests a number of risk management measures for forces, including that, "*Resilience can become depleted with time, with the need for consideration being given to introducing job rotation and tenure for particularly demanding roles*".⁶ Ensuring the necessary risk management measures are in place will provide support for officers, adding to their resilience and reducing levels of stress.

> Isolation

Recommendation 13:

The IOPC recommends that the MPS should assure itself that sufficient steps have been taken to ensure appropriate supervision and welfare is in place to prevent officers becoming isolated through their duties.

Supporting evidence and rationale:

⁶ College of Policing psychological risk management introduction and guidance 2017. V0.1

46. There was evidence to suggest that although other teams were on rotating night shift duty with them, the permanent team operated in isolation, preferring to receive briefings, and take breaks in a room separate from others. The team is understood to have rarely seen colleagues above the rank of sergeant. Being isolated from wider police teams and the lack of adequate supervision may have created a sense that the isolated team were not subject to the same standards and scrutiny, allowing for conduct issues to become more widespread and unchallenged.

> Supervision

Recommendation 14:

The IOPC recommends that the MPS should take steps to ensure there is effective supervision and quality assurance in place for officers where there is little measurable work output to review, to ensure the maintenance of policing standards and officers' wellbeing.

Supporting evidence and rationale:

47. The team that was the focus of the Operation Hotton investigations is understood to have rarely seen colleagues above the rank of sergeant. There were two sergeants per team, which was made up of approximately 20 police officers. There was one police inspector responsible for six such teams. Further, given the nature of the police officers' work, there was no way of monitoring their work other than going out with them, or phoning them on their radio, which was rarely done. The lack of adequate supervision may have allowed conduct issues to become more widespread and unchallenged.

> Acting up and unofficial promotion

Recommendation 15:

The IOPC recommends that the MPS should review current guidance and policy in relation to acting up to ensure there is transparency and clarity on how acting up positions are decided. The guidance should ensure that decisions for officers acting up are recorded, and there is an appropriate balance between short-term business needs and its commitment to equality and diversity.

Supporting evidence and rationale:

48. During the course of the Operation Hotton investigations, investigators noted a particular issue with perceptions about the fairness and transparency of how 'acting up' opportunities were decided and the impact on the rest of the team in terms of being supervised effectively and on those who felt overlooked. A lack of understanding about the process for acting up and transparency surrounding those opportunities, including documented rationales, can also create concerns around equality of opportunity.