



**METROPOLITAN  
POLICE**

## **PROFESSIONALISM HQ**

Mr Sal Naseem  
Regional Director for London  
Independent Office for Police Conduct  
PO Box 473  
Sale  
M33 0BW

Matthew Horne  
Deputy Assistant Commissioner

New Scotland Yard  
Victoria Embankment  
London  
SW1A 2JL

Email: [Matthew.Horne@met.pnn.police.uk](mailto:Matthew.Horne@met.pnn.police.uk)  
Tel: 0207 230 0813 or 101

Our ref:

Date: 26<sup>th</sup> October 2020

*Dear Mr Naseem,*

Thank you for your letter of 21st August 2020. Please consider this as the Metropolitan Police Service's (MPS) response to the IOPC's learning recommendations made under Paragraph 28A, Schedule 3 of the Police Reform Act 2002.

All of the learning recommendations are accepted by the MPS.

The MPS believes that stop and search is a vital tactic to keep Londoners safe and welcomes the learning recommendations intended to improve policing encounters and outcomes. The MPS recognises that how stop and search is approached, trained and delivered remains a significant area of concern for communities across the capital and is committed to ensuring that every encounter is conducted as professionally as possible. We recognise the impact that even a thoroughly professional encounter can have on an individual stopped and searched, and that its impact can resonate more widely with communities.

I have outlined below where work supporting the intended outcomes of your recommendations is already underway as well as providing detail of what further work is planned to demonstrate our commitment to maintaining and enhancing the legitimacy of stop and search.

### **IOPC recommendation and MPS response.**

#### **1. Why that Person – Impact of Disproportionate Use of Powers?**

**The IOPC recommends that the MPS take steps to ensure that their officers better understand how the application of their stop and search powers impacts individuals from a group that is disproportionately affected by those powers.**

## **The MPS may wish to consider:**

- **incorporating the lived experience of BAME people into existing stop and search training;**

The MPS recognises the value of incorporating the lived experiences of Black, Asian and Minority Ethnic communities into its training. A number of different schemes across London are currently being undertaken, with a senior level overview by Commander Jane Connors in her role as the MPS' Stop & Search Lead. The MPS intends to evaluate the various schemes and ensure that best of practice from these is adopted and incorporated into training.

Since 2018 the MPS has adopted an approach where all new police officers meet community members from their own policing area to discuss stop and search and the wider issues that surround it. During COVID-19 this has been more challenging to deliver however many Basic Command Units (BCU) have successfully utilised online engagement and this will continue until face to face sessions can resume.

The MPS is developing an ambitious plan of existing activities and new initiatives to embed both reflective learning and the lived experience to broaden understanding for officers who have moved from student officer training and embarked on their initial BCU deployment phase known as 'street duties'.

Towards the end of this formative part of their foundation training, it is under active consideration that students access additional learning connected with stop and search as seen through the eyes of community members. A draft outline of a potential input has been developed ready for testing in early 2021. However, this is the subject to a full impact assessment to understand design and costing.

## **Outline proposal:**

Sessions 1-3 will focus on raising an officers' sense of the importance of their job as police officers and provide them with an opportunity to reflect on the human aspect of knife crime and serious youth violence, by hearing from individuals with powerful stories of lived experiences. The elements to be delivered are as follows:

Session 1: IAG chair opening.

Session 2: A bereaved parent's story and reflections on knife crime.

Session 3: A gang member's story to enable reflection on the safeguarding aspects of stop and search, how exploitation occurs and highlight the human impact of gangs.

Sessions 4-7 are designed to allow officers to reflect on the quality of all of their encounters with the public:

Session 4: Community perspectives on Stop and Search with every BCU represented via community members reflecting on their personal Stop & Search encounters.

Session 5: BAME officer reflections on Stop and Search encounters and how this has shaped their operational practice when they search people at work.

Session 6: Role reversal Stop & Search video.

Session 7: Unconscious bias session reflections from the previous sessions.

Understanding the importance of localism we encourage BCU's to deliver inputs that reflect the experience of those local communities. Examples include the 'Mentivity' programme underway in 'Area South' BCU, which presents a poignant personal journey around police encounters shared with local officers from a credible, authentic voice from within the community. This has been delivered to a number of recruit cohorts throughout their training.

Another example of such work is underway in 'Central West' BCU where stop and search leads are making a training video of the lived experiences of those searched to help understand the encounter from the perspective of those being searched, across a much wider reach of officers.

Pan London units such as Violent Crime Task Force (VCTF) and Taskforce also have engagement programmes with communities that enable them to have discussions on lived experiences and the impact on stop and search, especially with young men from Black, Asian and Minority Ethnic communities.

BCUs are planning to ensure a consistent input from local communities and those who experience stop and search as a standard part of their street duties' course.

Additionally the MPS will deliver with four of London's universities the new police entry routes under the Police Education Qualifications Framework (PEQF) from January 2021. An element of this training is called the London Curriculum. This is intended to provide student officers with an understanding of London's rich history including the factors affecting the capital's diversity and key events which resonate with its communities today.

- **the role scrutiny panels can play and how the guidance in the revised and updated College of Policing stop and search Authorised Professional Practice (APP) could be applied;**

The MPS supports and facilitates monitoring groups across London to scrutinise stop and search activity, watch Body Worn Video (BWV) footage, examine stop and search performance data and review suitably anonymised stop and search records to assess the officer's grounds. Such meetings are chaired by London's 32 Community Monitoring Groups (CMGs), with local police in attendance. The chairs of each group form a pan London panel, the Community Monitoring Network (CMN), which has been established for almost 20 years and continues to work closely with the MPS on a range of stop and search issues.

In compliance with the revised College of Policing Authorised Professional Practice the MPS has re-introduced the CMGs ability to review BWV footage. The MPS acknowledges that this is an essential part of community focused stop and search scrutiny. Whilst the viewing of BWV was suspended to allow the MPS to ensure it was compliant with relevant data protection legislation, it has now started with sessions being held during September and October 2020.

- **proactively engage with impacted communities in ways that promote trust and confidence in the use of stop and search – the Reasonable Grounds Panel approach undertaken in Northamptonshire Police is a positive example;**

The MPS has a system to allow community members to examine the reasonable grounds provided by officers. This allows for CMG members to engage in sessions with their local policing stop and search lead officer where reasonable grounds are examined on redacted search records and outcomes are discussed. Improvements to this scrutiny process will be implemented to provide both the BWV and the search record for that incident to ensure that the entirety of information relevant to that encounter is made available. This will be implemented in full by December 2020.

The changes to the CMG BWV viewing involves the viewers providing feedback that is then centrally collated. This will enable the MPS to identify any themes for consideration by the Stop & Search Gold Group under Commander Connors.

There are 32 borough based CMGs with the offer to each of a monthly viewing of BWV which involves (depending on the length of each BWV) three searches per session.

- **wider roll-out of the Enhanced Stop and Search training currently piloted in West Area BCU if there is evidence to show that it is having a positive impact on community confidence.**

The MPS welcomes the acknowledgement of the West Area BCU's pilot and intends to evaluate it to assess its impact on community confidence. The evaluation is due to take place at the end of November 2020.

The MPS has another similar training package to that being trialled in the West Area BCU in the form of its 'Policing Behavioural Detection' training. It was delivered to the Violent Crime Task Force during September 2020 and the evaluation is due in January 2021.

The MPS recognises the importance of stop and search training and delivers a wide range of training products for stop and search. One has recently been awarded a prestigious Princess Royal training award. These other products include:

#### Initial Recruit Foundation Training

- The current recruit foundation course input has increased to two and a half days recognising its importance as part of the wider curriculum. It will attract similar attention with the new PEQF framework from January 2021.
- The course focuses on the quality of encounter and the wider community issues surrounding stop and search. The Pan London Community Monitoring Network was involved in the training design phase and contributed to parts of the content.
- The student officer input will be further enhanced from January 2021.

#### A Different View – Stop and Search Judgement Exercise

- In order to enhance public trust and confidence, the MPS has developed a video based exercise to give both new officers and communities' a deeper insight into police thinking and decision making. The exercise was developed with the overarching aim of improving community confidence in the use of stop and search.
- The exercise has been delivered to a wide range of community groups including a Youth Parliament, Independent Advisory Groups, various conferences and London's own stop and search CMGs.
- The 'Different View' course was recently awarded a Princess Royal Training Award. The training programme was also highlighted as good practice during the 2019 HMICFRS inspection.

## Bitesize Stop and Search Training Videos

The MPS has recently made a series of eight short animated training videos covering the key areas of stop and search. These animated videos are easy for officers to watch and are designed to be short and informative, covering the important key themes of stop and search. The new videos have been positively received by officers and cover the following topics:

1. An introduction to stop and search
2. Levels and powers of search
3. Reasonable grounds to suspect
4. The quality of encounter
5. Section 60 for searching officers
6. Section 60 for authorising officers
7. More thorough searches where intimate parts are exposed
8. Supervision of stop and search

These videos are designed to cover the key issues identified through community feedback and other organisational learning. They are hosted on the corporate 'LinkedIn Learning' site making them easy to access to enable continued development.

**The IOPC recommends that the MPS ensures that there is a structure in place to ensure leaders and supervisors are proactively monitoring and supervising the use of stop and search powers and addressing any concerning trends or patterns/ sharing any identified good practice at; individual, unit or organisational level.**

**The MPS may wish to consider:**

- **real-time supervision;**
- **regular dip-sampling of officer's body worn video footage;**
- **developing a process to capture regular concerns and share best practice;**
- **the role of reflective practice in this area;**
- **input and ownership at all levels; and**
- **how the related guidance in the College of Policing stop and search APP in this area of supervision and monitoring could be applied.**

The MPS recognises that supervision is vital in stop and search and this message is frequently reiterated to supervisors including specific guidance articles on the front page of our internal intranet pages, a specific stop and search site within our intranet and on various published blogs regarding stop and search.

The MPS recognises the importance of real time and BWV focused supervision of stop and search encounters and our performance in this must improve. This is a standing agenda item on the weekly and monthly MPS wide governance meetings. To further drive improvements a new, revised supervisors' checklist will be issued in November 2020 that will broaden the focus from a process centred supervision to a wider supervisory view of the whole encounter. This will also enable the production of improved management information to provide greater insight which will be considered by the Stop and Search Gold Group.

The broader use of stop and search supervision is also closely monitored by the monthly Gold Group which is chaired by a Commander and the Central Stop and Search Team.

The levels of stop and search supervision are closely monitored. There is a 72 hour target for supervision of stop and search records which was implemented to ensure supervision is completed in a timely fashion. More detailed analysis of supervision has been undertaken to

establish the length of time taken to supervise each stop and search and to enhance emphasis on the quality of supervision. Dip sampling of the supervision process will now be monitored through the Stop and Search Gold Group.

Currently 93% of all stop and searches are captured on BWV which is vital to enable supervisors to dip sample a wide variety of stop and search encounters of their staff. One of the new bitesize videos focuses specifically on the supervision of stop and search and offers a range of practical advice for the effective supervision of stop and search including real time supervision, supervising stop and search records and dip sampling officers' BWV.

The MPS Use of Force Strategic Oversight Group has developed a system for communities to review wider encounters of concern – often when raised as a result of viral social media footage. The Group has been meeting every fortnight since early June 2020 and the MPS is now taking steps to ensure this process is rolled out across London's BCUs complimenting the CMGs. The groups will review police encounters with the supervisors of the officers involved in order that feedback and learning can be enhanced by community views and experiences. It is anticipated that these Groups will be in place in all BCUs by March 2021.

The MPS has an existing organisational learning process to enable reflective organisational practice which consists of six components:

1. Central dip sampling by the stop and search team, (BWV, forms and s60 authorities).
2. Local issues are identified in the BCU organisational learning process and then raised at MPS' Stop and Search Gold Group.
3. Frontline reference group insight.
4. Strategic consultative group which consist of representative from has Directorate of Professional Standards (DPS), Learning & Development, Officer Safety Training, Police Staff & Support Associations and Black Police Association.
5. The central team scan and own all IOPC, HMICFRS and external report recommendations to ensure learning is implemented.
6. Central team have links with stop and search leads in other forces and NPCC to capture learning.

The MPS recognises that visible and informed leadership at all levels is vital and to complement first line supervisors the role of the local senior lead for stop and search is fundamental. Whilst considerable guidance and resources are available for supervisors the MPS acknowledges this does not exist for senior leaders. As such the central team intends to create an induction package for all new local Stop and Search leads to inform and empower them to discharge this function effectively. This will be completed and delivered by March 2021.

**The IOPC recommends that the MPS takes steps to ensure that assumptions, stereotypes and bias (conscious or unconscious) are not informing or affecting their officer's decision making when it comes to carrying out stop and searches, especially when using these powers on people from the black community.**

**Given the potential limitations associated with implicit bias training, the MPS may want to consider:**

- **giving greater attention to external regulation, such as decision-breaks and real-time supervision.**

Supervisors are encouraged to patrol with their officers to see their use of stop and search first hand and the MPS seeks to ensure that stop and search activity is supervised through the checking of all stop and search records and dip sampling of BWV. This process is

overseen by the Stop and Search Gold Group where supervision is regularly discussed with the stop and search lead from each BCU across London.

The MPS recognises that this front line supervision is an area that needs to improve and we intend to mandate that every front line supervisor view a stop and search encounter for each officer in their line management once every three months. This viewing can be directly when on patrol or by reviewing the BWV. A new supervisor's checklist will be used and the findings shared with the officer to enable improvement. This will be managed locally by BCU stop and search leads and overseen at the Stop and Search Gold Group. This will be mandated to begin by 1<sup>st</sup> December 2020.

Supervising stop and search activity is included on the Sergeant and Inspector's initial leadership courses and in the MPS new bitesize videos on key areas of stop and search – one of which focuses solely on the supervision of stop and search.

Unconscious bias training forms part of the initial police foundation course and will be included in the new PEQF framework from January 2021. 'Procedural Justice' learning outcomes are also part of a new curriculum design process which underway for officer safety training.

- **the approach adopted to bias within the Enhanced Stop and Search training currently being piloted in West Area BCU.**

The MPS welcomes the acknowledgement of the 'West Area' pilot and we look forward to the evaluation of this programme.

**The IOPC therefore recommends that the MPS take steps to ensure that their officers are not relying on the smell of cannabis alone when deciding to stop and search someone and use grounds based upon multiple objective factors.**

The MPS initially implemented this approach in 2012 and it remains MPS policy. We continue with its messaging and training to reaffirm this message, in initial training for officers and also with the bitesize videos. In particular, in the 'Reasonable Grounds to Suspect' video the message is once again made clear to officers.

It is recognised that the quality of the grounds recorded form a vital part of police legitimacy and this is an area in which the MPS is seeking to improve. A working group has been recently established of front line leaders to develop ways of prompt and effective improvements to the grounds recorded by officers. Recommendations are anticipated by the end of November 2020.

## **2. Communication – GOWISELY**

**The IOPC recommends that the MPS takes steps to ensure that officers carrying out stop and searches always use the principles of GOWISELY and engage in respectful, meaningful conversation with the person being stopped.**

The MPS recognises the vital importance of each stop and search encounter using the principles of GOWISELY and engage in a respectful and meaningful conversation. GOWISELY is included in initial training and a variety of other training for established officers. The MPS has also developed a 'Quality of Encounter' (Q of E) Model. Using GOWISELY as the starting point, the MPS Q of E model ensures that officers engage with the person being searched, explain the process, ensure they understand, correctly record the search, and reassure the person as to why the MPS uses stop and search.



The Q of E message has been reiterated during large scale briefings (such as the recent Bank holiday weekend anti-violence initiative) which included specific briefing slides to remind officers to focus on the quality of encounter for every stop and search.

Q of E remains a key part of initial police training and will also be included in initial officer training within the PEQF from January 2021.

**The IOPC recommends that the MPS ensure their stop and search training incorporates a section on de-escalation, including the roles of supervisors and colleagues in controlling the situation and providing effective challenge.**

As previously mentioned the MPS is in a process of developing officer safety curriculum which blends procedural justice learning outcomes with traditional use of force tactics. Strengthened de-escalation learning outcomes are also a key component part of this new blended approach. Increasingly the MPS' approach to learning will focus on building transferable skills across our workforce that can be effectively applied from one operational context to another at both the supervisor and constable level.

Subject to imminent investment decisions, the MPS has plans to involve community members in both the development and delivery of our recruit stop and search training from April 2021.

**The IOPC recommends that the MPS takes steps to ensure that officers exercising stop and search powers are ending the encounters once their suspicion has been allayed, in a manner that minimises impact and dissatisfaction, unless there are further genuine and reasonable grounds for continued suspicion.**

The MPS accepts and understands the importance of concluding an allayed search in a manner that increases trust and confidence. The MPS has introduced the concept of an 'allayed' rather than a so-called 'negative' search. It forms a key part of the Q of E model under the Reassure section. This was designed to specifically consider how to professionally end the encounter by acknowledging the impact of being searched and leaving a positive impression. This forms part of the initial student officer training. Students are assessed in an allayed search encounter and the skills required to conclude the encounter in a satisfactory way.

The MPS acknowledges this is an area that requires further improvement and dip sampling of BWV footage still highlights some poor quality encounters. This work continues to be developed through the scenario input for officer safety training and will be formally included within the enhanced safety training from April 2021.

### **3. Use of Force/Restraint - Handcuffs**

**The IOPC recommends that the MPS take steps to ensure that officers exercising stop and search powers are not using restraint/handcuffs as a matter of routine and are only using these tools when reasonable, proportionate and necessary.**

The MPS is conducting a handcuff review recognising the concerns of London's communities. This is being led by Deputy Assistant Commissioner Twist with the findings of the review expected to be presented to the Commissioner by November 2020. There is particular attention being paid to the use of handcuffs as a pre-emptive measure.

Areas for specific consideration as part of this review are as follows:

- The legal and policy basis for the use of handcuffs pre arrest



- The training officers receive in the application of handcuffs
- The data which shows the extent to which handcuffs are used
- The extent to which there is accountability for the use of handcuffs in records
- Digital solutions for recording
- Engagement with key stakeholders internally and externally to understand their perspectives

I am keen to share the outcome of this review and the MPS decisions in due course.

**The IOPC recommends that the MPS amend their stop and search records to include a question about whether any kind of force has been used. The records should also state where information about the kind of force will be recorded.**

The MPS recognises that its current recording practices includes stop and search forms, use of force forms and also potential arrest notes and statements. The recording of force is mandated and is currently recorded on the MPS Use of Force Reporting Form. There is a specific question on the form as to whether the incident was related to a stop and search – and if it was, what the search was for e.g. s.1 PACE etc. Included on this form is a section around the justification for force being used which included a further question as to where else such information has been recorded. It asks the officer to justify why they have used force that may include the following:

- Protect public
- Protect subject
- Protect other officers
- Prevent offence
- Secure evidence
- Effect search
- Effect arrest
- Method of entry
- Prevent harm
- Prevent escape
- Other

Furthermore, the officer will need to account for the powers they have employed in the application of the force used.

The MPS recognises that the Stop and Search record does not include a mandatory use of force section, although this is recorded on the separate Use of Force Form. Digital solutions are being scoped to include use of force on the stop and search form itself. Simplification of these recording requirements form part of the handcuff review being undertaken and I will ensure that IOPC colleagues are update with the outcome of this work as soon as possible.

#### **4. Use of Body Worn Video**

**The IOPC recommends that the MPS take steps to ensure that their officers are following APP and MPS policy and switching on their BWV camera early enough to capture the entirety of a stop and search interaction.**

The MPS agrees that body worn video is vital in providing an accurate record of encounters. The use of BWV is mandatory in stop and search.

MPS officers are taught and directed that they should activate their BWV at the earliest possible opportunity in order to maximise the potential to capture evidence. This is communicated in the MPS online e-learning training, which all officers and staff must complete before they use their camera.

This is supported by the pre-event buffer functionality on the Axon cameras used by the MPS. When the camera is turned on, it is in pre event buffer mode, whereby the camera will be capturing video but no audio, in a 60 second loop. The compliance with use of BWV is done through the Stop and Search Gold Group led by Commander Connors and compliance is currently at 93%.

**The IOPC recommends that supervisors take a proactive role in monitoring and ensuring compliance with BWV APP and MPS policy.**

The MPS reports high compliance rates with officers recording stop and search encounters on BWV at 93%. Supervision of stop and search activity includes checking that the relevant links to the footage are attached to the stop and search report on the MPS intelligence system.

The MPS has also created a BWV dashboard that provides data on compliance for use of BWV when carrying out stop and search. This dashboard provides high-level data at a MPS and BCU level, but can also be broken down to individual teams, which is a useful tool for supervisors. The dashboard data is also shared at the MPS wide Stop and Search Gold Group.

The requirement for front line supervisors to observe their officers undertaking a stop and search once every three months will now be mandated and compliance rates monitored through the monthly Stop and Search Gold Group under Commander Connors.

**Conclusion**

The MPS accepts and welcomes these recommendations. Stop and search remains a vital policing tactic in keeping Londoners safe and the activities being undertaken both alongside and as a result of these recommendations demonstrates the organisational commitment to maintaining and enhancing the confidence of those who live, work and visit the capital.

If you have any queries regarding this response or if I can be of any further assistance please do not hesitate to contact me.



**Matthew Horne**  
**Deputy Assistant Commissioner**