

PROFESSIONALISM HQ

Mr Jonathan Landau HM Assistant Coroner South London Coroner's Court 2nd Floor, Davis House Croydon CR0 1QQ

Deputy Assistant Commissioner New Scotland Yard Victoria Embankment London SW1A 2JL

Date: 17th August 2022

Dear Mr Landau

I am the Deputy Assistant Commissioner for the Directorate of Professionalism in the Metropolitan Police Service (MPS), and I am responding on behalf of the Commissioner of Police of the Metropolis in relation to the matters of concerns raised following the conclusion of the inquest into the death of Louise Theresa Bailey who sadly died on 1st August 2019.

Matter of concern:

Chapter 13 of Roadcraft, the Police Driver's Handbook, provides that before officers begin their response to an emergency call, they should go through a process of risk assessment. That includes consideration of whether other units are closer. However, in this case the driver and operator did not know the answer to that question. In part that was due to the fact that officers are encouraged to avoid assigning themselves over the radio during an ongoing incident to prevent clogging up of airwaves. However, I heard evidence that several units did in fact assign themselves over the radio, though not all with their location, and that no training is provided as to when to assign over the radio and when not to. Moreover, there is an emergency button which allows the originating officer to override other broadcasts if needed mitigating any risk of clogged up airwaves.

My concern is that the current system and training does not facilitate drivers being provided with the information they need to answer the question "are other units closer?" which means they are unable to complete a full risk assessment.

In response to the matter of concern regarding MPS driver training, it is the MPS Driving School which is responsible for preparing and delivering the emergency response aspect of all MPS driving courses in line with national minimum requirements. Due to the complex nature and volume of practical training required, attendees are required to complete the theory aspect of learning and pass an exam prior to attending the practical training module. Specific reference is not made in training to the Roadcraft Handbook, however the principles of Roadcraft are embedded within MPS driver training, including the standards of emergency response driving outlined in Chapter 13.

Prior to the emergency response aspect of the course, officers are provided with classroom input covering the use of their exemptions under the Road Traffic Act, including use of emergency equipment (blue lights and two tone sirens) and the personal considerations that must be taken before activating them. Drivers are taught to continually risk assess the circumstances before them, which requires consideration of all the facts available to them before utilising exemptions. The nature of the incident, the route to take, and the proximity and abilities of other attending units should all be considered. The training officers receive encourages them to conduct a dynamic risk assessment prior to and during an emergency response.

MetCC

Met Command and Control (MetCC) is made up of two very distinct and completely separate sections. These are "First Contact", the department responsible for answering all emergency and non-emergency calls made by the public to 999 or 101 and more recently any form of digital enquiry (text, email, online submission); and "Despatch", the function of which is to assign incidents requiring attendance based on urgency, to co-ordinate and control on-going incidents and ensure police units on the streets have the information they require. A Despatch Officer otherwise known as an operator, is responsible for dispatching police officers to deal with incidents across London. Their main function is to ensure incidents are despatched in accordance with priority, and that the appropriate level and amount of resources are assigned. Once those resources are assigned, the Operator ensures that any updates or information regarding the incident is logged appropriately and passed to units on scene. It is the on-going role of the Supervisor to ensure the wider oversight and control of not only an individual incident, but the whole Basic Command Unit (BCU). This includes: the management of resources at every incident; ensuring incidents and calls are assigned within designated charter times; ensuring information and safety notices are communicated; making BCU supervisors aware of any risks or issues and the wider general management of all resources and radio transmissions on the talk groups assigned to that BCU. This ensures that in the event of an urgent assistance, emergency activation or serious incident, the BCU is able to respond efficiently and effectively. In the event of an issue with any of the above functions, the MetCC duty officer has direct communication with their BCU counterpart.

The relationship between MetCC and a BCU is an extremely close one, the performance of both departments is dependent on the effectiveness of this relationship, and in the event of any serious incident both MetCC and the BCU work together to form part of the debrief process. It is common for MetCC to direct units to attend a location, to de-assign units if they are not required and to challenge inappropriate radio use, but the fluidity of incidents means it is impractical for this to always be done.

Given the importance of the role of MetCC in monitoring and managing the response and ongoing resourcing of incidents, in the event of a request for urgent assistance, among other things, MetCC operators will always have primacy over the Radio Channel (Talkgroup) regardless of an emergency activation, therefore all radio transmissions in the event of a request for assistance must be kept to a minimum, including by MetCC operators.

<u>CAD</u>

The MPS uses the CAD (Computer Aided Despatch) system for command and control functions, which has a mapping function built into it. The system generates data collected from police vehicle GPS, known as IVMA (In Vehicle Mobile Application) and from the officer's Airwave radio, APLS (Automated Personal Location Service) and plots the vehicle's location onto a map to assist with location based deployment and management of units deployed to incidents such as cordons or road closures. Location updates are received at 90 second

intervals which are then reflected on the CAD mapping system to give an estimation of vehicle location. There are limitations to the CAD mapping technology as the GPS signal received to provide the location, whether IVMA or APLS, is solely reliant on mobile data, therefore the reception or signal strength of the IVMA/APLS can restrict the effectiveness of the system as an accurate method of despatch.

The CAD mapping system is accessed and monitored in the MetCC control rooms. Its use is encouraged when despatching incidents and is widely used by MetCC operators to ensure efficiency and to limit travel time. It is acknowledged that there is a lack of formal instruction around self-assignment with regards to what is deemed an urgent assistance CAD. To resolve this issue and ensure a consistent approach across the organisation, the MPS is in the process of amending the "Standards of Radio Procedure" section of the Airwave manual to state that the radio should not be used as a tool for officers to assign themselves to emergency incidents. This will ensure a consistent and corporate approach across all 12 BCU's and reduce unnecessary radio traffic in the event of an emergency assistance

There is a facility within the IVMA in-car system which allows supervisors to view where local resources are, however, the accuracy of this depends on the signal strength received by the vehicle and its consistency is location dependent. However, Regulation 109 of the Road Vehicles (Construction and Use) Regulations 1986 makes it unlawful for display screens within vehicles, which show text, to be deployed in a position where the equipment can be seen by and potentially distract the driver. This means the IVMA in vehicles can only be viewed below a speed of 5 mph limiting the ability of the IVMA in fast time or spontaneous incidents.

The MPS is currently in the process of procuring a replacement Command and Control system to replace the current CAD system. The proposed replacement, "OnCall" is a map based despatch programme which is designed to drive efficiency in deployment of officers to incidents. The function of the OnCall system means that more control and responsibility will be given to MetCC Despatch Operators.

The OnCall system will have the ability to calculate the travelling times of units and show information surrounding the policing skills of the officers in each vehicle, which in turn will enable a more intelligence based approach to deployments. It is the MPS' view that the OnCall system will address the concerns raised by HM Assistant Coroner in his report, by ensuring appropriate assignment of vehicles based on distance and skill set. The system will not, however, change the expected response by officers to incidents of urgent assistance, for the reasons outlined. Due to the individual nature of those incidents, this will still require an initial multi-unit response in accordance with current practice.

The deployment protocol for officers when dealing with requests for urgent assistance is that all available vehicles should make their way to the scene until notified that no further assistance is required. MetCC is responsible for monitoring those transmissions, updating the CAD and ensuring that all information is passed to those attending, including updates and ensuring any message to cancel the need for more assistance is broadcast. Ordinarily, notification that no further assistance is required comes from a cancellation from the requesting officer, an update from the first officer(s) on scene or from a third party such as CCTV or another emergency service, such as the London Ambulance Service, or London Fire Brigade. It is rare for officers attending an urgent assistance to be cancelled other than by a police officer at the scene.

Every request for urgent assistance is unique. It cannot be assessed against previous incidents or intelligence, and the existence of other units attending does not negate the need for officers continuing to make progress. It is of paramount importance that appropriate resourced response is provided to officers without delay. Any delay increases the risk of injury to officers, suspects and to the public.

As detailed above, there is a requirement for all officers to assign themselves to calls until informed otherwise and to keep all radio transmissions to an absolute minimum. It is not practical to control the incident based on mapping data, nor is it appropriate to select or deselect vehicles or officers to attend based on location.

Airwaves/ Radio

All MPS officers and MetCC operators are trained in the use of Airwave radio procedures during initial training, this includes the process surrounding an emergency activation. This is to ensure Airwaves are kept clear.

The MPS Airwave Standard Operating Procedure (SOP) "Standards of Radio Discipline" is in place to ensure the best working capacity of the network by governing and restricting use. All officers are taught the principles of the SOP as part of initial officer training whilst learning how to use the radio. Standards of radio discipline are based upon the "Radio ABCD" principle and must be adhered to.

It is down to the individual officer to ensure they are aware of and follow the "Radio ABCD" principles, and it is the responsibility of MetCC controllers and supervisors to manage the talkgroups they are controlling. A copy of the Radio ABCD principles are enclosed with this response. The principles are: **Accuracy, Brevity, Clarity and Disciplined.** In respect of a request for emergency assistance or use of the emergency button function, the SOP states:

"In the event of an emergency activation or request for urgent assistance; all other traffic should immediately cease. Use of this status is reserved for incidents of imminent threat or harm".

In addition, the MPS "Urgent Assistance" SOP assists MetCC operators in the actions to take in the event of a request for urgent assistance or activation of the emergency button. When a particular incident has a SOP in relation to it, a message is auto generated onto the CAD to assist and guide the operator. This aide-memoir style message is there to ensure all actions in accordance with the SOP are followed. The Urgent Assistance SOP states: "Keep radio transmissions to absolute minimum except those requiring assistance" and "All resources deployed are done so as a priority".

Emergency activation

The Coroner's report references the emergency activation button featured on the Airwave radio; otherwise referred to as either the *Emer button, Emer activation* or *Urgent assistance*. The emergency function on the Airwave radio is a safety feature which allows officers requiring urgent assistance and who are unable to transmit normally to have priority over the Airwaves with a single push of a button. Upon initial activation the requesting officer is immediately placed at the top of the transmission list and has a period of 10 seconds during which their radio microphone is open. The officers have an initial period where they can give a location and reason for assistance without having to manually use the "talk button", (otherwise known as the transmit button) freeing up their hands to deal with the issue they are facing. This is known as a "hot mic period". The activation is accompanied by persistent beeps and a vibration of all radios attached to the talkgroup which notifies others to the emergency call. After the initial 10 second hot mic period, the officer will be required to push the transmit button as normal in order to continue transmission, and will continue to take primacy of the radio. The officer will automatically transmit until the activation has been reset by MetCC operators.

The purpose of the emergency activation button is to inform all users of an urgent assistance and to allow the officer a 10 second period to broadcast details of the situation and location

whilst having the use of both hands to deal with the threat or issue they are facing. This initial 10 second period will override all other radio traffic including MetCC, however after the initial period, whilst the activated radio will continue to override other radios it does not override MetCC transmissions. This is to ensure MetCC can co-ordinate the response to the incident and ensure units attending are kept up to date without interruption or confusion. The ability of MetCC to be able to transmit is vital as there have been circumstances when a talk button has become stuck or a suspect has held the button to disable communications. The use of the emergency activation function must only be used in specific cases where there is an imminent threat of harm and should not be used to simply transmit on a busy talkgroup. Correct use and resetting of the emergency activation procedure is the responsibility of the MetCC controller for the talkgroup affected.

In Conclusion

The MPS delivers training to all MPS drivers in line with the national minimum requirements. Our drivers are taught to continually risk assess the circumstances before them which requires consideration of all the facts available to them. MetCC ensure the appropriate level and amount of resources are assigned to each incident and once those resources are assigned, the Operator provides updates and information regarding the incident to units on scene and de-assigns units if they are not required. However, the fluidity of incidents means that it is not always practical for this to be done.

It is acknowledged that there is a lack of formal instruction around self-assignment with regards to what is deemed an urgent assistance CAD. To resolve this issue, the MPS is in the process of amending the "Standards of Radio Procedure" section of the Airwave manual to state that the radio should not be used as a tool for officers to assign themselves to emergency incidents. The MPS is procuring a replacement Command and Control System which will replace the current CAD system. It is envisaged that the new system will assign vehicles based on distance and skill set. However, this will not prevent officers responding to urgent assistance requests where all available vehicles should make their way to the scene, or other incidents requiring the rapid attendance of numerous resources (for example, a major incident) until notified that they are no longer required.

I wish to express my sincere condolences to the family of Mrs Bailey. I trust the above information provides reassurance that the MPS has considered the matters of concern raised by Her Majesty's Coroner and that they have been addressed in relation to this matter. Please do not hesitate in contacting me should you have any queries.

Yours sincerely

Deputy Assistant Commissioner

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