

# Summary of IOPC Conclusions

Police handling of indecent exposure committed  
by Wayne Couzens in 2015 and 2021.

**Operation Mondego – 2021/152591.....1**

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Investigation name:	<b>Operation Mondego</b>
IOPC reference:	2021/152591

## Summary of IOPC conclusions

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A summary of our conclusions and our rationale is set out below for Kent Police.

### Police Sergeant X<sup>1</sup>

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#### > Allegations of breached standards of professional behaviour

1. It is alleged that Police Sergeant X failed to appropriately and thoroughly investigate an allegation of indecent exposure which took place on 9 June 2015.

#### Case to answer for misconduct

#### > Summary of rationale

##### **Allegation One:**

PS X was allocated as the officer responsible for progressing this matter on 17 and 18 June 2015 and made the decision to close it down. PS X suggested he was not the only person working on the case and his decision would have been subject to supervision. We did not see evidence to support his account in relation to this point.

PS X outlined that he did not have any specific training on investigating indecent exposure. This appears to be the case. However, PS X had been working in his role for over a year when this incident occurred and the ability to carry out investigations into this level of crime was considered a core competency. We did not consider the matters key to this investigation required PS X to have received any specialist training in indecent exposure, but instead are common considerations when carrying out any investigation. While his level of training may be relevant to a tribunal, it does not impact our decision on whether he has a case to answer.

The evidence indicated that PS X researched Mr A and Wayne Couzens, as the registered keeper of the vehicle linked to this allegation. He spoke with Mr A on the phone who confirmed he

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<sup>1</sup> The officer has been anonymised in line with the IOPC Naming Policy.

did not want to support the investigation. PS X did not, however, carry out any other enquiries such as:

- CCTV enquiries in the area of the incident.
- Identifying further witnesses, in particular it appears Mr A's partner may have been a witness to this incident but PS X did not establish this.
- Contacting Mr Couzens to establish if he was still the registered keeper of the car or obtaining other details from him on his whereabouts at the time of the incident.

It was not possible to obtain any policy on how such matters should have been investigated in 2015, but current policies indicate that basic enquiries such as taking witness accounts and carrying out CCTV enquiries should be made. This is supported by Insp Godhew's account of his experience of investigations of this type in 2015.

On 17 June 2015, PS X made an entry on the crime report before having spoken to Mr A or any other person linked to the incident. In that update he appeared to have paraphrased or summarised what was already written on the crime report. It appeared that at the time this update was written, PS X had formed the view that Mr A may not have been telling the truth. However, the only matter in dispute was the colour of the suspect's top. Subsequently, on 18 June, PS X appeared to have spoken with Mr A who confirmed the information he had provided to the call handler and confirmed he was unsure about the colour of the top worn by the suspect. The investigation was closed due to the crime being undetectable and PS X cited that the offender was unknown and there were discrepancies between Mr A's account and the ANPR images. The entry by PS X also referenced Mr A's mental state, however there is no evidence PS X did any further enquiries in regard to this, other than reading the entry which had been input by PC Jones.

In our opinion, there is little to no evidence that PS X considered the consistencies in Mr A's account when assessing this matter, despite his account being supported by other surrounding evidence. PS X referenced that Mr A was embarrassed when on the phone to him. Although the significance of this comment is not clear, it could be considered that PS X took the view that Mr A's embarrassment was in some way detrimental to his account or the reliability of it rather than being a natural reaction to being the victim of such an offence.

The audit of Kent's database and intelligence systems showed Mr A had a criminal record which PS X accessed. Although it is impossible to know what specific detail PS X reviewed, a tribunal may wish to consider whether this information impacted his opinion of Mr A and his reliability. Such a tribunal may wish to also consider whether PS X put undue weight on the information PC Jones recorded on the STORM (System for Tasking and Operational Resource Management) log about the comment made by staff when interviewed, without seeking to verify it.

The Authorised Professional Practice (APP) specifically states an assumption should not be made that a crime is not detectable.

We are aware that a crime report such as this would have been considered “*volume crime*” and is on the lower end of the scale of severity of crimes. It would therefore have been reasonable for PS X to deal with the matter in a proportionate way.

There was no evidence of there being an intentional failure to investigate the matter. There is limited evidence that PS X knew or recalled Wayne Couzens when dealing with this matter and no evidence of PS X acting dishonestly.

Regarding the harm caused by PS X’s actions, while arguably at the time of the incident there was limited harm caused by PS X actions, this needs to be considered with a wider perspective. PS X’s alleged failure to obtain more details from Wayne Couzens and input on the crime report led to the crime report not being linked to Wayne Couzens in any meaningful way on the Police National Database. This could have had implications in relation to Wayne Couzens’ vetting to join the MPS. Although this would have been unknown to PS X, it is relevant to consider in terms of the harm caused by his actions.

We consider that a reasonable tribunal, properly directed, could consider PS X made such an assumption in this case and failed to follow other reasonable lines of enquiry. We believe that such a tribunal could find that PS X failed to carry out his duties in this matter based on assumptions he made about Mr A’s reliability and truthfulness without thoroughly investigating that matter.

However, we did not see anything in the evidence which we consider to be particularly aggravating or would elevate this matter to warrant dismissal if proven or admitted. As such, we consider that the matter should be dealt with as misconduct and proceed to a misconduct meeting.

## **Misconduct proceedings**

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In April 2023, Kent Police held a misconduct meeting for PS X. It was found that the officer had breached the standards of professional behaviour but it did not amount to misconduct nor warrant a written warning.

It was decided that PS X would undergo reflective practice.

The chair of the independent panel specifically raised that PS X should be provided with training on sexual offences and undertake the crime academy around investigative processes.

The panel commented that the subject officer could have contacted and interviewed the suspect. By doing so, appropriate intelligence recording may have been made against the Police National Database to link the suspect to subsequent investigations. This could have affected future vetting applications but there is no certainty this alone would have prevented further offending.

## Organisational Learning

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The Police Reform Act 2002 affords the IOPC powers to issue two types of learning recommendations.

**Section 10(1)(e) recommendations** – these can be made at any stage of the investigation. The recipient is not required to provide a formal response to the IOPC.

**Paragraph 28A recommendations** – these must be made at the end of an IOPC investigation and the issue subject to learning must have come to light due to the investigation. The recipient is required to provide the IOPC a formal response. Recommendations are published on the IOPC website, along with the responses received.

We identified several areas of learning for Kent Police relating to:

- Kent Police improve their guidance for conducting volume or low-level criminal investigations, providing more specific information on lines of enquiries.
- Kent Police consider reviewing and amending guidance on sexual offences and call gradings to ensure relevant witness details are captured.
- Kent Police consider the appropriateness of response officers handling indecent exposure cases and whether its severity warrants the investigation by specialist, investigative teams<sup>2</sup>.

Following consultation with Kent Police, we issued one recommendation in May 2023.

**The IOPC recommends that Kent Police considers developing an aide memoire or other form of guidance document for Local Police Team (LPT) officers conducting volume or low-level crime investigations. Such a document should provide a non-exhaustive list of enquiries to be considered during volume and low-level crime investigations and should be in line with the College of Policing Authorised Professional Practice (APP) guidance on managing investigations.**

This follows an investigation where a member of the public reported an incident of indecent exposure to Kent Police. The informant provided comprehensive details about the indecent exposure including the location, driver description, car make, model, colour, and registration. Kent Police conducted checks on the vehicle and the registered owner was confirmed. An LPT officer was allocated the case to progress, he filed the case for closure after the informant's reliability was questioned.

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<sup>2</sup> Please note, the bulleted points refer to our potential organisational learning prior to our discussion with Kent Police.

Over the course of the IOPC investigation it became clear that basic investigative enquiries were not properly carried out by the LPT officer in charge of the investigation. Consequently, reasonable lines of enquiry were not pursued and the details of the suspected offender were not placed on the crime report. Subsequently the individual was not linked to the incident as a suspect on the Police National Database (PND). The individual involved in the case was a serving police officer with Civil Nuclear Constabulary at the time of the offence, who transferred to the Metropolitan Police Service (MPS) at a later date.

The IOPC understands that Kent Police has made widespread changes to the way indecent exposure investigations are handled, with indecent exposure investigations now being the responsibility of the Vulnerability Investigation Team (VIT) and not Local Policing Teams. As such indecent exposure is no longer treated as a volume or low-level criminal investigation. In addition, further safeguards have been put in place to ensure indecent exposure investigations are assessed by a detective sergeant before being closed to ensure the investigation has been carried out thoroughly and extensively.

Since 2015 Kent Police has developed a detailed crime investigation policy which is provided to all of its officers to assist them when carrying out investigative tasks as part of Kent Police investigations. Whilst the crime investigation policy was not in place at the time of the incident under investigation, the LPT's failure to carry out what in 2015 was deemed a volume/low level criminal investigation is a cause for concern.

As such the IOPC believes it necessary to provide Kent Police the opportunity to consider a further aide memoire as suggested in this recommendation for its LPT officers/officers untrained in investigative decision making. The IOPC recognises the actions taken by Kent Police since 2015 and as a matter of public confidence invites Kent Police to outline those actions in full in response to this learning recommendation in order to publicly highlight the progress it has made and enhance public confidence.

Kent Police have 56 days to provide a written response to our recommendation. This will be available on [our website](#).

Investigation name:	<b>Operation Karatash</b>
IOPC reference:	2021/150091

## Summary of IOPC conclusions

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A summary of our conclusions and our rationale is set out below for the Metropolitan Police Service (MPS).

### PC Samantha Lee

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#### > Allegations of breached standards of professional behaviour

1. It is alleged that PC Lee failed to carry out appropriate actions when conducting the initial investigation into two incidents of alleged indecent exposure which occurred at a McDonalds in South London on 7 and 27 February 2021.

#### **Case to answer for gross misconduct**

2. PC Lee provided a false account to the IOPC regarding her actions surrounding CCTV and intelligence checks.

#### **Case to answer for gross misconduct**

#### > Summary of rationale

##### **Allegation One:**

There is no doubt from the evidence that PC Lee was the officer allocated to attend the appointment booked with Mr B after he reported two incidents of indecent exposure at the McDonalds where he worked.

PC Lee was responsible for carrying out initial or primary investigations into the matter. PC Lee had a two-hour slot allocated on 3 March to attend the appointment. PC Lee appears to have spent significantly less than two hours at the appointment, with Mr B describing she was only there for approximately 15-20 minutes.

We considered several specific points in relation to PC Lee's actions during and following this appointment, outlined below.

## **CCTV**

PC Lee did not obtain any CCTV footage during her appointment with Mr B on 3 March 2021, nor did she record any CCTV enquiries on the crime report. There is a clear discrepancy in the evidence about what was said between PC Lee and Mr B about available CCTV during the appointment. PC Lee states that Mr B told her there was no CCTV as it automatically deleted. Mr B believed he showed PC Lee the available CCTV.

It is apparent that CCTV was available at the McDonalds at the time PC Lee attended the appointment. This CCTV would have potentially showed the vehicle involved in the incident, although it appears the footage would not have shown the person's face or the offence taking place. From conversations which took place with the initial call handler, as well as Mr B's subsequent actions, it appears that he was aware of the CCTV and its potential significance to the police in conducting their investigation. As such, a tribunal may consider it likely Mr B showed this to PC Lee or, at a minimum, told her of its existence.

The evidence indicates on 12 March, PC Lee told superiors that Mr B had told her the footage from the drive-through automatically deleted and was therefore not available. As this conversation took place close to the time of the appointment on 3 March, and before PC Lee knew CCTV would become a matter in question during our investigation, it potentially indicates that it was her honest recollection of the matter that the CCTV did not exist.

There is also a potential that there was a misunderstanding between PC Lee and Mr B. It is apparent they spoke about images or footage from the drive-through attached to the restaurant. We now know that images are taken of customers at the drive-through, but they automatically delete after an order is collected. It is possible for a panel to consider that PC Lee took this to relate to all CCTV rather than just images from the drive-through.

Although there are several explanations for why there is a discrepancy between Mr B and PC Lee's accounts, we consider it is a matter for a tribunal to decide, which version of events it considers to be more likely on the balance of probability. If the panel prefers Mr B's account, then it would be open to that panel to find PC Lee either failed to understand the potential evidential significance of the CCTV at McDonalds, or failed to obtain material which was clearly relevant to any future investigation.

Also relevant to this aspect of PC Lee's actions is that there is no evidence that PC Lee carried out any other CCTV enquiries in the surrounding area. We understand the McDonalds is situated on a small service area with a petrol station. Other CCTV cameras may have been positioned in the area but there is no evidence PC Lee conducted a search. A reasonable tribunal could



therefore find that PC Lee failed to carry out other CCTV enquiries despite having sufficient time to do so within the two-hour appointment slot she was allocated to deal with this matter.

The relevant policy in regard to an initial investigation clearly states officers should search for and exhibit relevant CCTV. All enquiries should be recorded on the crime report as well as those which have a negative result, and no CCTV is found.

It is our view a reasonable tribunal properly directed could find PC Lee failed in her duties and responsibilities in regard to the search for and recovery of CCTV evidence.

### **Witness accounts and receipts**

As detailed in the report, PC Lee obtained from Mr B both informal handwritten accounts from the witnesses to the indecent exposure and receipts related to the suspect's food orders at the times of the offences. There is no dispute in this regard.

It is also clearly evidenced that PC Lee did not record that she had received these items on the crime report or formally log these items. According to Inspector Jones' account PC Lee did not exhibit these items and produced them out of a pocket on 12 March when she was notified of our investigation.

It is apparent from the account of Inspector Jones, as well as PC Lee's responses during interview, that PC Lee may not have considered the accounts to be evidential. PC Lee appears to have understood the receipts may have some evidential value but still did not exhibit or record them anywhere in the crime report. It is our view that these items were clearly evidential and should have been handled as such. However, even if a tribunal accepts PC Lee believed they were not evidential, they ought still to have been recorded on the crime report as per the policy.

Based on the above it is our view a reasonable tribunal could find PC Lee failed in her duties and responsibilities in regard to the handling of the handwritten witness accounts and receipts.

### **Arrest considerations**

PC Lee's account is that there were no grounds to arrest Wayne Couzens on 3 March as she did not have formal witness statements from the victims. However, she had obtained handwritten accounts from the witnesses which provided a rough description of the suspect. Additionally, checks on the registration of the vehicle believed to be involved in the offence showed Wayne Couzens to be the only male keeper. The registration of the vehicle could have been checked against relevant CCTV to corroborate the accounts had that been obtained.

The vehicle checks did not, however, give any information of Wayne Couzens' age or ethnicity which limited the opportunity for it to be cross-referenced with the accounts of the victims. However, there was potential for a request to be made to Kent Police for officers to conduct a 'registered keeper' check, which is a check to establish if Wayne Couzens was still the owner of the vehicle. This would have provided more evidence in establishing who was driving the car at the time, yet no request was made by PC Lee.

Additionally, PC Lee had till receipts with the last four digits of the card used to place the food order. It may have been possible to use this information to establish who the card belonged to. While such enquiries would likely have taken time and PC Lee may not, herself, been able to

carry out these checks there is no evidence PC Lee considered progressing them. As noted above, PC Lee did not make any mention of the existence of these receipts let alone any potential enquiries which could be carried out using them.

While a panel may accept PC Lee's consideration that she did not have enough information to carry out an arrest on 3 March, it may also consider she failed to be proactive in carrying out any enquiries to establish who was driving the vehicle and the time of the offence or set lines of enquiry in motion to allow for an arrest (or an interview under caution) to be considered.

### **System checks**

The crime report and system audits show PC Lee conducted Police National Computer (PNC) checks on the linked vehicle registration and the name 'Wayne Couzens' which returned no relevant results. However, there is no evidence PC Lee conducted checks on a system call the Integrated Intelligence Platform (IIP). Although the MPS policy does not specify exactly what checks should be carried out on individual cases, checks using this system appear to be routine. This is evidenced by PC Lee's account that she normally carries out such checks.

Based on the above a reasonable tribunal, properly directed could find PC Lee failed to carry out all appropriate checks. Those checks would not have brought back any relevant results, but PC Lee cannot have known this without carrying them out.

### **Record keeping**

Comprehensive records should be kept in relation to any investigation to ensure appropriate detail is kept of what has occurred. This is acknowledged in both MPS general investigation policy and College of Policing approved practice on managing investigation. This is more significant where a handover will take place, such as another team like the My Investigation Support Team (MIST) taking over an investigation.

There is clear evidence that PC Lee did not write the following on the Crime Reporting Information System (CRIS) report:

- Any detail related to CCTV enquiries. The MPS general investigation policy states that it is important to note negative enquiries and therefore there is an expectation she should have recorded her understanding (if that is accepted) of the CCTV from the McDonalds having been deleted and details of what enquiries she had made with Mr B.
- Any record of the written accounts received from Mr B or the till receipts he provided to her. These are clearly important pieces of information which should have been include on the crime report.

Additionally, there is no record on the crime report of the details provided in the handwritten accounts from the witnesses, such as their description of the suspect, which would have been of

assistance to anyone taking over the investigation. This is all clearly very significant and relevant information.

We consider a reasonable tribunal, properly directed, could find PC Lee failed to appropriately record her actions in relation to this case.

### **Handover and ownership of the investigation**

PC Lee's account is that she believed the investigation would be allocated to MIST after her initial enquiries. This appears to be confirmed by various superiors who have explained that, if the initial investigation was to a good standard, MIST would have taken it over. An audit of the crime report also shows that PC Lee did not access it after 3 March, which supports her account to some degree.

How MIST would have become aware of the need for them to take over the investigation is, however, a point which lacks clarity. PC Lee does not appear to have made anyone in MIST aware the matter was waiting for them to take over. Nor did she allocate her line manager as supervisor so they could pick this up. PS Cooper stated it would have been PC Lee's responsibility to notify MIST – it appears she failed to do this.

Additionally, PC Lee explained the reason she did not undertake certain actions, such as obtaining the availability of the witnesses, was because she believed that would be done by MIST. However, the College of Policing approved practice in relation to managing investigations clearly states an investigation should be conducted thoroughly and it should not be assumed, "*that someone else will carry out an investigation at a later stage*".

A reasonable tribunal may consider that PC Lee failed to carry out thorough enquiries and assumed these would be done by someone else rather than using the time available to her to complete them. A panel may also find PC Lee failed to ensure the investigation was appropriately handed over to MIST.

### **General considerations**

While some of the above matters above, if a standalone issue, may not individually lead to the officer having a case to answer, it is our view that they show a pattern of behaviour. We consider a reasonable tribunal, properly directed, could find that there is evidence of numerous and consistent failures from the officer to act in accordance with the high standards expected of her as a police officer and in line with the relevant policy in regard to managing investigations.

We note that PC Lee argued that it was her understanding that MIST would take over the investigation and progress it, which may have impacted on her actions. It is apparent that MIST may have taken over the investigation had they been aware of it, but they were not. In any event this does not impact on the actions PC Lee should have carried out on 3 March before handing the matter over to MIST. We do not consider this point to be relevant to considerations of severity of the allegation.

It is arguable that there is no indication of malice intent on the part of the officer. However, this should be considered alongside the other allegation the officer faces which potentially adds relevant context to her actions. For example, if it is found she deliberately lied to the IOPC

investigation to cover up her failings it follows that she was aware of those failings at the time, or aware she had not performed her role sufficiently. This may suggest a level of intent.

A panel, could, therefore find that PC Lee knew what she should have done but failed to do it. It is of note that PC Lee had been allocated a two-hour appointment time to progress the initial or primary investigation, however from Mr B's account, she spent 15 to 20 minutes at the McDonalds on 3 March. If the appointment time had been kept in full, it would have provided ample time for PC Lee to undertake the appropriate and necessary enquiries.

Based on the above, we consider that a tribunal would be justified in considering dismissing the officer if the allegation was found proven and as such this matter should be dealt with as gross misconduct and proceed to a misconduct hearing.

### **Allegation Two:**

PC Lee provided an account in response to regulation notice in which she stated she had conducted IIP searches relating to this matter on 3 March. There is clear evidence that PC Lee did not carry out these searches. The evidence therefore directly contradicts her account and calls that account into question.

Additionally, as noted above, there is a clear contradiction between PC Lee's evidence and that of Mr B as to whether she was aware CCTV existed at the time she attended the appointment on 3 March. In interview with the IOPC, PC Lee specifically said Mr B was wrong in his account and insisted Mr B did not show her any CCTV. If a panel were to find that PC Lee was aware relevant CCTV existed then that finding would call PC Lee's account to the IOPC into question. There are several explanations as to why PC Lee and Mr B may have provided different accounts on this matter, but one legitimate finding would be PC Lee knew the CCTV existed and provided misleading or false information to the IOPC .

At the time PC Lee provided her response to notice she was aware she was under investigation and that her actions related to a high-profile investigation. This may be relevant to a panel's considerations as to whether PC Lee may have had motive to provide an accurate account to the investigation.

To offer balance, PC Lee did not have access to the crime report at the time she provided her response to notice and could therefore not see what she had recorded contemporaneously. This may account for her inaccurate recollection. Indeed, this was PC Lee's explanation of why her account regarding IIP searches was inaccurate. However, we believe it is for a panel, having heard all the evidence, to decide if they accept her account.

We consider that if allegation two is taken at its highest it would amount to the officer deliberately attempting to mislead an IOPC independent investigation by concealing her own failure in her duties to carry out checks and appropriately secure and record relevant CCTV evidence. This allegation calls into question the officer's honesty and integrity and therefore her ability to carry out her role as a police officer. Specifically, in relation to the question of CCTV a panel could find that PC Lee attempted to blame Mr B for her own failing which would be an aggravating factor.

In reaching its decision, a tribunal may wish to take in to account the pattern of PC Lee's behaviour. If the officer is found to have consistently failed in her duties and responsibilities, it is

our opinion it would be open to the panel to find PC Lee deliberately lied to the IOPC in order to conceal those failures.

Based on the above it is appropriate that a panel would have the option to dismiss the officer, if the allegation were proven, and therefore it is our opinion the case should be dealt with as gross misconduct and proceed to a misconduct hearing.

## Acting Police Sergeant (A/PS) A<sup>3</sup>

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### > Allegations of breached standards of professional behaviour

1. It is alleged that A/PS A failed to appropriately supervise the investigation into two incidents of alleged indecent exposure which occurred at a McDonalds in South London on 7 and 27 February 2021.

### **No case to answer**

### > Summary of rationale

#### **Allegation 1:**

It is our view that A/PS A's role as the local resolution team sergeant was to ensure a 'skeleton' crime report was set up after the call handler booked the appointment for an officer to attend McDonalds to speak with Mr B. The purpose of this role is to ensure crimes are recorded within the timeframes outlined in the National Crime Reporting Standards. A/PS A did not have any responsibility to investigate the allegation of indecent exposure, nor was he responsible for supervising PC Lee's actions or ensuring the matter was being progressed. In addition, the crime report was set up within the relevant timescales, indicating A/PS A performed his duties appropriately.

A/PS A remained allocated as the supervisor on the crime report as neither he, nor PC Lee, assigned her line manager as supervisor. A/PS A stated he would normally do this but there is nothing in the evidence to suggest he did so on this occasion. However, although this is a potential failure on his part, it is our opinion it is not severe enough to breach of the standards of professional behaviour.

Based on the above, it is our view that no reasonable tribunal could find A/PS A failed in his duties and responsibilities and as such he has no case to answer.

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<sup>3</sup> The officer has been anonymised in line with the IOPC Naming Policy.

## Misconduct proceedings

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In May 2023, a police disciplinary panel held a misconduct hearing for PC Lee.

On 23 May, the panel found gross misconduct proven against former PC Lee.

Misconduct was proven over her failures in the initial investigation of indecent exposure allegations involving Couzens and gross misconduct was proven for her failure to be honest and integral in response to allegations during the IOPC investigation.

The panel ruled that she would have been dismissed had she still been serving, and she will be added to the barred list preventing future employment with the police.

## Organisational learning

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The Police Reform Act 2002 affords the IOPC powers to issue two types of learning recommendations.

**Section 10(1)(e) recommendations** – these can be made at any stage of the investigation. The recipient is not required to provide a formal response to the IOPC.

**Paragraph 28A recommendations** – these must be made at the end of an IOPC investigation and the issue subject to learning must have come to light due to the investigation. The recipient is required to provide the IOPC a formal response. Recommendations are published on the IOPC website, along with the responses received.

We identified potential areas of learning for Metropolitan Police Service and following consultation, we issued three recommendations in May 2023.

- 1. The IOPC recommends that the Metropolitan Police Service (MPS) issues an accessible guidance document to Emergency Response Team (ERT) Officers outlining the expectations and processes involved when handing a case over to the My Investigation Support Team (MIST). This should include the initial investigative actions ERT Officers are expected to carry out when attending an appointment as well as providing clear instruction on how to pass an investigation over to MIST.**

This follows an IOPC investigation where an Emergency Response Team (ERT) Officer attended a fast-food restaurant drive-through to conduct initial inquiries into a report of indecent exposure. The officer conducted a system check which confirmed

the name of the registered owner of the vehicle. The officer did not take any further action in relation to identifying the suspect or progressing the investigation for the next seven days, at which point the investigation was taken over by a different team.

During the IOPC investigation it became apparent that in addition to the failure to carry out the necessary initial investigative enquiries, the ERT Officer had experienced some confusion in relation to how the investigation would be passed across to MIST.

At the time, MIST was a new team which had been recently introduced to investigate and progress non-serious or complex crimes as well as assisting with prisoner processing requirements.

Both the failure to complete initial investigative enquiries and the confusion surrounding the passing over of a case to MIST is indicative of a wider issue amongst ERT officers. The current process requires the responding officer to complete the initial investigative enquiries so that a Crime Reporting Information System (CRIS) can be completed and passed onto MIST. It would appear that the issue remains unresolved and ERT officers are still requiring reminders of their duty to carry out proper initial investigative enquiries before handing over an investigation to MIST.

Failure to carry out proper initial investigative enquiries could result in investigations being unnecessarily prolonged with enquiries having to be carried out again by MIST due to important information being missed. Furthermore, this could lead to potential evidential sources being missed altogether if evidential gaps are not highlighted later in the investigation. Therefore, an easily accessible guidance document such as the one suggested here would provide ERT Officers with a helpful reminder to refer to when carrying out initial investigative enquiries, ensuring that the necessary steps have been taken before handing over a case to MIST for further investigation.

**2. The IOPC recommends that the Metropolitan Police Service (MPS) considers the development of a system which automatically notifies the Directorate of Professional Standards (DPS) of when a serving police officer is linked to an ongoing police investigation.**

This follows an IOPC investigation where an Emergency Response Team (ERT) Officer attended a fast-food restaurant drive-through to conduct initial inquiries into a report of indecent exposure. The officer conducted a system check which confirmed the name of the registered owner of the vehicle. The officer did not take any further action in relation to identifying the suspect or progressing the investigation for the next seven days, at which point the investigation was taken over by a different team.

During the IOPC investigation it became apparent that when the identity of registered owner of the vehicle was confirmed, the individual's role as a serving MPS officer was not highlighted on MPS intelligence systems. As part of the IOPC's enquiries, the MPS confirmed that the Integrated Intelligence Platform does not provide information of an individual's status as a serving police officer and that such information would only be made apparent if the individual provided their occupation to a police officer as part of an investigation.

Due to the increased level of responsibility afforded to police officers, it is a cause for concern that there is no system in place which allows the MPS to be made aware of when a serving MPS officer is suspected of committing an offence.

The IOPC is aware that the MPS is working on developing and/or improving a system called CONNECT. As the MPS are considering changes to their IT systems the IOPC believes this would be an ideal time for MPS to consider how it could embed an automated function to provide an alert when an MPS officer is subject to a police investigation or when a serving police officer from another force is linked an ongoing MPS investigation.

On account of the DPS being the body responsible for maintaining professional standards within MPS, the IOPC believes that the DPS would be the department best placed to monitor such a system.

Automatically notifying the DPS of when a serving MPS officer is linked to a police investigation would afford the opportunity for the DPS to filter the most serious investigations and monitor the relevant officer during the course of the investigation. Furthermore, as a matter of public confidence, the DPS could also consider if any type of intervention is necessary depending on the seriousness of the alleged offence, to restrict an officer's interactions with members of the public whilst an investigation into their actions is ongoing.

**3. The IOPC recommends that the Metropolitan Police Service (MPS) ensures that its call handlers are aware that they have discretion when assigning the length of time slots for police officers to attend car appointments for allegations of sexual offences.**

This follows an IOPC investigation where an Emergency Response Team (ERT) Officer attended a fast-food restaurant drive-through to conduct initial inquiries into a report of indecent exposure. The officer conducted a system check which confirmed the name of the registered owner of the vehicle. The officer did not take any further action in relation to identifying the suspect or progressing the investigation for the next seven days, at which point the investigation was taken over by a different team.



During the IOPC investigation it became apparent that the appointment for an ERT officer to attend the fast-food restaurant made was by the call handler. The appointment was booked for three days after the instance of indecent exposure was reported to MPS. The current Met CC/BCU Appointments Policy states all appointments should be arranged within 48 hours of first contact or as soon as possible thereafter. For non-domestic appointments, as long as there is no risk and the victim agrees, the appointment can be made for anytime within the next seven days.

When a member of the public calls the Met Contact Centre wishing to report a crime which meets the criteria for a car appointment, the call handler may arrange an appointment slot for one or two hours depending on the complexity of the crime being reported. Whilst the IOPC accepts that the current wording of the Appointments Policy already provides discretion to call handlers when assigning timings for car appointments, it also understands there has been previous instruction to assign two-hour slots when booking appointments relating to sexual offences.

Whilst the IOPC recognises the necessity of initial investigative actions for sexual offence allegations being carried out, there is a concern that any rigidity surrounding two-hour appointments may discourage members of the public meeting with police officers soon after the alleged offence has taken place due to other pre-arranged commitments. This could potentially lead to evidential material being lost and reducing the effectiveness of an investigation.

If a shorter appointment slot would allow a member of the public to meet with a police officer at an earlier date and report an alleged offence, it may be preferable to allow the call handler to exercise their professional judgment and book a one-hour timeslot instead of two. This would allow the member of the public to meet with a police officer sooner so that an investigation can be progressed at a quicker pace.

The Metropolitan Police Service have 56 days to provide a written response to our recommendations. This will be available on [our website](#).

Our investigations into the Met and Kent Police's handling of the indecent exposure allegations highlighted there is no system in place to alert forces that a suspect in a criminal case may be a police officer.

We will be exploring this as a potential national learning recommendation with the National Police Chiefs' Council.

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