

Text highlighted in blue must not be changed

EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment Standard Operating Procedure/Guidance **must** be used when completing this form:

http://intranet.aware.mps/Corporate/Policy/Territorial_Policing/SOP/Equality_Impact_Assessment_SOPs.htm

Protective Marking:	Not Protectively Marked	Publication	Yes
Title:	Equality Impact Assessment on the Standard Operating Procedures for the Police Use of Firearms		
Branch / OCU:	Firearms Policy Unit, Central Operations		
Date Created	14/04/2011	Review Date:	11/05/2012
		Version:	2
Author:			

Decision Making

Decision Maker:

Name:

Rank or Grade: Chief Supt

What is the decision?

Reject the proposal

Yes

No

Implement the proposal

Yes

No

Produce an alternate proposal (if so, a new impact assessment must be completed)

Yes

No

SMT / (B)OCU/Management Board endorsing decision

Name:

Rank or Grade: Chief Supt

1. Aims and Purpose of Proposal – see step 1 of the guidance

The policy relating to the Police Use of Firearms (PUoF) within the Metropolitan Police Service (MPS) establishes a corporate standard presenting a clear framework for MPS staff. It clearly outlines procedures, roles and responsibilities to ensure that all armed operations are necessary, proportionate, legal and that the MPS is accountable.

All policy in relation to the MPS PUoF is codified within the Standard Operating Procedures (SOP) on MPS PUoF (hereafter referred to as the SOP). The SOP provides a structure to ensure that any firearms operation complies with the relevant legislation to enable the deployment of armed officers within the law, with particular regard to The Human Rights Act 1998 and the ACPO Manual of Guidance on The Management, Command and Deployment of Armed Officers 2010 (ACPO MCDAO).

The SOP is for the benefit, safety and security of all communities in London, as well as the general public

who travel into the Metropolitan Police District (MPD) area to live, work or socialise. It also applies to MPS officers and staff who may be operating in an armed capacity outside of the recognised boundaries of the MPD. In addition to the public at large, the SOP notably impacts upon MPS Police Officers, staff and stakeholders (ie Metropolitan Police Authority, Home Office, Greater London Authority). It also affects persons suspected of, or involved in, armed crime, as well as those subjects' families, friends and associates. The MPS has a duty to safeguard all of these groups or individuals.

The aim of the Equality Impact Assessment (EIA) is to ensure that the SOP complies with key legislative requirements, ie Race Relations (Amendment) Act 2000 and The Equality Act 2010, which combines all discrimination legislation. This legislation enforces a positive duty on the MPS to have due regard to issues affecting disability, gender, race, religious beliefs, faith or sexual orientation in areas of employment, training and the provision of services. By taking these six strands into consideration, the MPS is promoting positive equality, eliminating discrimination and promoting equal opportunities.

An essential element of the EIA is to ensure that stakeholders are identified and involved in being actively consulted, wherever possible, on the development of the SOP. The MPS strives to maintain quality policing by listening, consulting and responding effectively within the community in a clear and transparent manner. This is in an effort to ensure that our approach sufficiently takes into account community needs and the impact of armed policing upon them. This, it is hoped, will encourage greater community involvement and therefore not only continual improvement of the SOP, but also a high level of community reassurance, facilitated by a greater understanding of the competing demands under consideration within any firearms operation.

To prepare for the completion of this EIA, the SOP has undergone an extensive consultation process. It is important to note that the SOP is considered to be a living document under continual review and consultation with the ability to reflect any changes in legislation or safety critical information in a timely manner. It is through this organic approach that best practice and procedures are promulgated. This process includes capturing best practice, not only within MPS firearms commands but also from non firearms commands and national and international external agencies.

2. Examination of Available Information – see step 2 of the guidance

The MPS provides an armed capability to assist in combating armed criminality and terrorism within the MPD and throughout the United Kingdom. These duties include diplomatic protection, Royalty protection, airport security, court security, armed surveillance, armed escorts, armed personal protection, Central London security patrols, as well as spontaneous and proactive armed operations.

The MPS will only arm officers who have undergone a specific selection and training programme. Each Authorised Firearms Officer (AFO) is required to maintain specific levels of fitness and training in order to continue in their role. AFOs are equipped only in accordance with their training and role. No officer will be deployed without the appropriate authority.

When considering authorisation of a firearms operation, procedures have to be adhered to, as outlined within the SOP. Throughout the authorisation process there is a continual requirement to assess the impact of any operation on the community and to allow for any community impact assessment to be considered within the planning process. This directs that advisory groups and/or the local community should be consulted whenever possible within the constraints of the armed policing operation. Such constraints may include the need for confidentiality or the fluidity of an operation meaning that its final location is not known in advance. The impact of a community impact assessment could be that in some circumstances the operation might not proceed. All community consultation that takes place during the authorisation process for a firearms operation is recorded within the authorisation documents. These authorisation documents cannot be shown as complete until the impact on the community has been considered. The documents prompt both the author and the authorising officer to consider the six strands of diversity and to continue to consider the impact of any firearms operation on all sections of the community throughout the authorisation and planning phases, the actual operation itself and the post operation period.

Firearms commands provide a support role to unarmed policing activity. There are approximately 2700 armed officers within the MPS who undergo continual training and assessment, in addition to their operational commitments. Traditionally, therefore it has not always been feasible for firearms commands to build extensive community ties across the MPS and there has been a reliance on borough colleagues to

form and manage these relationships. However, in recent years this has changed and efforts have been made to provide communities and advisory groups with greater information about the type of armed policing operations that have been and might be carried out, the rationale behind the deployment of armed officers and a discussion around their likely impact on the community and how any negative impact might be minimised. Efforts have also been made to educate the public around the fast time decisions required of firearms commanders and armed officers. Further information about these activities is contained within the EIA for each individual OCU.

Firearms operations can be sourced from a wide variety of activities. Due to the nature of some of these activities, it is not always possible to anticipate the community impact or when the community will be impacted upon (ie during an armed surveillance operation that covers a broad geographical area). The contribution of Borough policing remains vital in identifying and understanding community concerns and tensions which may need to be taken into account, as well as providing information and reassurance following an armed policing operation.

The recently formed CO5 MPS Firearms Command Unit has Pan London responsibility for providing specialist command capability for planned firearms operations and support to OCUs in managing authorised spontaneous operations. To maximise community engagement and minimise subsequent community impact, the process will where possible include consultation during the planning phase of firearms operations with officers who have geographical responsibility for and knowledge of the area concerned. As such, these officers are most aware of local community issues, tensions and supporting networks. This benefits the operation by being able to proactively harness the local knowledge and skills of the community and Safer Neighbourhood Teams (SNTs) to assist in the management of the operation to shape and deliver solutions.

This EIA will engage the SOP which sets out a framework for the decision making process and procedures to be followed by all officers and staff when considering the planning, authorisation, deployment and post-incident procedures involving MPS armed officers and weaponry.

At the conclusion of every armed operation, those in command are required to ensure that a debrief of the personnel involved is carried out. The results of these debriefs are recorded on an electronic Armed Operations Database and are monitored by the FPU. Any areas of learning are incorporated into the SOP when and where it is appropriate.

The production of this SOP is driven by the needs of firearms practitioners, planners and commanders from conception to conclusion, providing a framework that supports the legislation for authorisation, deployment, strategies and tactics. It recognises the balance that needs to be maintained between their needs, what the law permits and what society deems to be acceptable.

The SOP does not direct strategy or tactical options and therefore neither are considered in this EIA. It does create uniformity in the implementation of procedures across ten armed commands with differing needs and functions and creates parameters within which they are permitted to operate. The SOP does not provide the means to scrutinise specific operations but does provide the standards by which they may be reviewed.

The choice of tactical options and the selection of equipment, including weaponry and ammunition, available to the MPS is directed by a bi-annual Firearms Strategic Threat and Risk Assessment (FSTRA). These subjects therefore fall outside of the scope of this EIA.

The SOP articulates the minimum standards of physical fitness and occupational health that are applied to armed officers within the MPS.

Each armed command is responsible for the recruitment and retention of its own staff and procedures may vary between OCUs. Therefore the recruitment process is not covered in detail within the SOP and such matters should be the subject of each individual command's EIA.

There are significant Human Rights, and other legal, considerations which are synonymous with all police firearms operations. One of the purposes of the SOP is to ensure that these legal provisions are undertaken. Legislation has also driven changes relating to less lethal weapon options, such as Taser, and therefore the requirement to cater for these and other such matters within the SOP.

Key areas of legislation that impact on the SOP are set out below. These should be considered in context

with the primary objective of all police firearms operations - safeguarding the public. In meeting this primary objective, police officers must identify and assess any threat or risk and then minimise and manage that risk using only such force as they deem absolutely necessary.

The aim of most firearms operations is to identify, locate, contain and thereby neutralise the threat posed. Whilst conflict management within the police service would normally aim to manage and minimise threats, the degree of threat justifying the deployment of authorised firearms officers (AFOs) is such that resolution must be more robust to ensure that no continuing threat exists.

The provisions for the use of reasonable force are contained within Common Law, S.3 Criminal Law Act 1967 and S.117 Police and Criminal Evidence Act 1984. They receive both constraint and validation through the Human Rights Act 1998, which incorporates the European Convention on Human Rights (ECHR) into domestic law. Article 2 of the convention is of particular relevance to firearms officers and the concepts of absolute necessity and proportionality contained in Article 2 demand an additional test to that of reasonableness in the aforementioned legislation.

The Human Rights Act 1998 and ECHR enshrine the rights of individuals and protect them against abuse of power by public authorities acting on behalf of the state. All staff employed by the Police Service, whether police staff or police officers, are members of a public authority and are required to comply with the ECHR. The MPS, as a public authority, is liable for any convention breaches by its individual employees, although this does not change the liability of employees with regards to civil action or misconduct proceedings. The necessary engagement of, or interference with, any human right must be fully justified and recorded.

Those suspected of firearms offences may have the following ECHR rights interfered with. However, such interference can be justified under the Human Rights Act 1998 and UK domestic law:

- Right to Life - Armed subjects may need to be stopped by using such force as is necessary and as is reasonable in the circumstances. The right to life of the public at large, those under threat of firearms offences and MPS staff must also be considered.
- Prohibition of Torture - Officers have the option of using less lethal options than conventional weapons, such as Taser. This must be a proportionate, legal and necessary alternative to the use of lethal force within the conflict management model to protect life or to incidents where officers are facing violence or threats of violence. The use of such measures are tightly controlled and audited.
- Right to Liberty - Subjects may be detained.
- Right to Privacy - Subjects may need to be placed under surveillance, authorised in accordance with the law and local policy.

Interference is necessary and can be justified in order to protect the right to life of others. Under Article 2 ECHR, deprivation of life shall not be regarded as inflicted in contravention of this when it results from the use of force which is no more than absolutely necessary in defence of any person from unlawful violence, but it must be strictly proportionate to the achieving of aims. Article 2 also places a positive obligation on the State to take preventative operational measures to protect life.

Article 2 has particular relevance to the planning of armed operations. When police are deployed with firearms, and hence capable of delivering lethal force, the effectiveness of command and control of those officers will be taken into account. It is not just the officer who uses force who must explain and justify their actions. It will also be necessary to demonstrate that the operation as a whole was controlled and commanded in a manner that respected the requirements of Article 2. For this reason, careful consideration will always be given as to how an incident could be dealt with without the use of lethal force. If lethal force is used, documentation must show that all other options were considered and the reasons why they were deemed inappropriate in the circumstances.

Officers involved in armed operations should be properly briefed, with only suitably trained and accredited officers being deployed. It is of great importance that proper consideration should be given to the need to avoid the risk of innocent persons being injured either directly or indirectly by the police, or by the subjects with whom they are engaged. Consideration must be made of the manner in which strict control was exercised in relation to the actual force used (as opposed to that anticipated when the operation was planned) to ensure that the force was proportionate and no more than absolutely necessary.

This policy therefore does not breach any ECHR rights, despite it being highly likely that in the event of any

suspected person being injured or killed as a consequence of Police action, legal processes will be instigated. This will ensure accountability through statutory investigations, coroner's inquests, criminal trials and other legal challenges.

3. Screening Process for relevance to Diversity and Equality issues – see step 3 of guidance

Does this proposal have any relevance to:					
a)	Age	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
b)	Disability	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
c)	Gender	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
d)	Gender Reassignment	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
e)	Marriage and Civil Partnership (employment only)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
f)	Pregnancy and Maternity	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
g)	Race	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
h)	Religion or Belief	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
i)	Sexual Orientation	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
j)	Other Issues	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

4. From the answers supplied, you must decide if the proposal impacts upon diversity or equality issues. If yes, a full impact assessment is required.

Full Impact Assessment Required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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5. Consultation / Involvement – see step 5 of the guidance

Who was consulted?

MPS Armed Commands
MPS Unarmed Commands
Firearms Policy and Strategy Group and its Sub Groups
DLS
DPS
MPS Diversity Directorate
Occupational Health
Health and Safety
Extreme Threat Review Group
Federation
Staff Associations
LAS
LFB
City of London Police
Independent Advisory Groups (IAG)
Armed Policing Reference Group (APRG)
NPIA
ACPO Armed Policing
ACPO Command and Control

Date and method of consultation

In **September 2008** consultation began with the NPIA regarding changes to the ACPO Manual of Guidance on the Police Use of Firearms and the introduction of an ACPO Manual of Guidance on Command and Control. This consultation continued throughout 2008 and 2009. It was initially designed to ensure that key changes were incorporated within the MPS SOP. However, as the process evolved staff from the FPU were able to influence key policy decisions at the NPIA around the command and control of firearms incidents and thus ensure that MPS practices - developed as a result of learning from firearms incidents and from wider

consultation procedures around armed policing within the MPS - were adopted on a national basis.

In **December 2008**, following initial work with the NPIA, a draft of the proposed MPS SOP was sent out to the head of all armed commands and those unarmed commands who worked with armed officers on a regular basis. A full précis of the proposed changes and both national and MPS level were attached to this.

In **February 2009**, representatives of the armed commands, federation and staff associations were invited to a two day workshop. This examined in detail the proposed changes to the SOP and their likely impact on armed policing within the MPS.

In **May 2009**, the FPU conducted a final review of the feedback from the internal armed command consultation process, the liaison with the NPIA and ACPO and organisational learning from inquests and investigations. It also set out the calendar for wider consultation processes, incorporating our key partners and community groups.

In **May 2009** the final draft of the ACPO Manual of Guidance on the Management, Command, and Deployment of Armed Officers was sent for legal validation. The FPU maintained a close working relationship with the NPIA to ensure that the feedback from this process was incorporated into the MPS process.

In **July 2009** a three day consultation process was conducted with the MPS armed commands to discuss the final draft of the revised SOP. The NPIA was invited to, and took part in, this process. A copy of the SOP was also sent out to DPS, DLS, Health and Safety, Occupational Health and the Federation and Staff Associations for their feedback. It was also passed to the City of London Police, Ministry of Defence Police, LAS, LFB, MPA, NPIA and ACPO Armed Policing for their reference. The Diversity Directorate were also consulted at this time.

In **July 2009**, a request was made, through the Diversity Directorate, that representatives from the FPU be allowed to attend each of the main strand IAG meetings to discuss the changes to the MPS SOP. The Disability IAG declined this request. The Gypsy and Traveller and Youth IAGs did not respond to this request.

In **September 2009** the FPU attended the LGBT IAG and provided a powerpoint presentation articulating the changes to the SOP, the drivers for these changes and the likely impact on their communities. Feedback from the IAG members was incorporated into the SOP review. A copy of the full SOP was sent to each of the IAG members who requested it.

In **September 2009** the FPU updated each of the Firearms Policy and Strategy Sub Groups regarding the changes to the SOP and their likely impact on armed policing within the MPS.

In **November 2009** attended the Trident IAG and provided a powerpoint presentation articulating the changes to the SOP, the drivers for these changes and the likely impact on their communities. Feedback from the IAG members was incorporated into the SOP review. A copy of the full SOP was sent to each of the IAG members who requested it.

In **November 2009** the MPS SOP and the ACPO Manual of Guidance on the Management, Command and Deployment of Armed Officers were published. The FPU immediately published copies of these documents on their intranet site. A comprehensive list of the changes that had been made was also published on the intranet site. The introduction of the new manual and SOP were published in notices to coincide with the launch. A separate email was sent out to all armed commands reminding them of the change in manual and SOP. An OCU specific powerpoint presentation was sent out to each of the armed commands, for the attention of all armed officers, detailing the changes to the SOP and the likely impact of these changes on their specific area of business.

In **December 2009** the FPU attended the Race IAG and provided a powerpoint presentation articulating the changes to the SOP, the drivers for these changes and the likely impact on their communities. The IAG members were advised that their feedback would be incorporated into an ongoing review of the new SOP and its implementation. A copy of the full SOP was sent to each of the IAG members who requested it.

In **December 2009** and **January 2010** the FPU attended each of the Link Commanders' Briefings to provide

details of the changes to the SOP and the likely impact of these changes on borough based officers who would most likely deal with and command spontaneous firearms incidents in the first instance.

In **January 2010** a powerpoint presentation was disseminated to all boroughs for the attention of all officers up to the rank of Inspector. This powerpoint presentation explained the changes to the SOP and their likely impact on borough officers in their dealings with firearms incidents. Contact details for the FPU and details about the FPU intranet site were provided for officers who required further information.

In **February 2010** the FPU attended the Armed Policing Reference Group and provided a powerpoint presentation articulating the changes to the SOP, the drivers for these changes and the likely impact of these changes on both the armed policing community and the wider public community. Each member of the APRG was provided with a full copy of the SOP in advance of this meeting and their feedback was incorporated into the ongoing review of the SOP and its implementation.

In **January 2011** the FPU conducted a housekeeping review of the SOP.

In **March 2011** and **April 2011** CO5 conducted a series of training days for Borough based Tactical Firearms Commanders. This included an update on changes to the SOP and their impact on firearms policing.

A full and in depth review of the SOP is scheduled for **June 2011**.

[Where are the consultation records stored?](#)

Within a secure filing cabinet in the Firearms Policy Unit, New Scotland Yard, 10 The Broadway, London. SW1H 0BG.

[Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?](#)

As a result of learning from investigations and consultation at a national level, significant changes were made to the nomenclature used in the command of firearms operations. This was to ensure that the command of a firearms operation could be clearly distinguished from that of the overall operation within which it sits.

There were also significant changes to post incident procedures following a fatal shooting, particularly in relation to note-writing and officers conferring. These came about as a result of investigations and community consultation and were the subject of much internal review and revision.

As a result of community consultation and investigation findings, national policy was changed to direct that no person significantly involved in an ongoing investigation may perform the role of Tactical Firearms Commander for the firearms element of the operation. This is to ensure greater independence in the management and command of firearms incidents.

It is now the personal responsibility of a firearms officer to report any factors, such as illness or bereavement, that might render them unfit for firearms duties. There is also a positive obligation on all officers to report incidences that they believe may be detrimental to another officer's ability to carry and operate firearms.

New legislation regarding Corporate Manslaughter, Misconduct in a Public Office and Health and Safety at Work has now been incorporated into the SOP.

A Firearms Command Cadre has been introduced for the command of all firearms operations. This came about as a result of post shooting investigations. It is intended to professionalise firearms command. It was favourably received by the community groups during the wider consultation phase.

Following consultation with the medical profession, professional organisations and service users, the entire section around persons with emotional and mental disorders has been re-written so as to be clearer and more sensitive. Greater training is now offered to firearms officers around recognising and dealing with persons suffering with EMD. The concept of provoked shooting was also introduced to the SOP following learning from investigations.

Housekeeping changes around the format, colouring and version marking of the SOP were also introduced to make it easier to navigate and identify.

6. Full Impact Assessment – see step 6 of the guidance

Explain the potential impact (whether intended or unintended, positive or negative) of the proposal on individuals or groups on account of:

Age

General: The SOP does not discriminate against or target directly people on the basis of their age. Every firearms operation is based on intelligence. Every police officer is treated equally in the firearms officer application process.

Within the MPS: Firearms officers are required to achieve and maintain high levels of physical fitness. They are also required to undergo regular eyesight and hearing tests. These requirements may be considered to have a negative impact on an older person. These requirements are national standards and have been developed through a number of independent studies. They are designed to protect the long term health and well being of the officer. The results of fitness tests are monitored and analysed and are used to identify possible areas of improvement.

Outside the MPS: Young people are more likely to be in possession of firearms and to be involved in gun crime. Therefore young persons might be said to be disproportionately affected by the SOP and its application. Training for firearms officers has been developed to help firearms officers to consider the impact of their actions on a particular section of the community and how any negative impact might be mitigated. Community work carried out by the CO19 Specialist Firearms Command has been key in encouraging young people to consider the implications of carrying a gun or in being involved in a gang that has links to firearms and in educating them as to the options available to police officers when faced with a person carrying a gun.

Disability

General: The SOP does not actively discriminate against officers with physical or mental disabilities. It does not discriminate against or actively target people on the basis of disability in relation to armed operations. Such operations are based on intelligence.

Within the MPS: The SOP does not actively discriminate against officers with physical and/or mental disabilities and those who are visually or hearing impaired. Firearms Officers are required to achieve and maintain high levels of physical fitness. They are also required to undergo regular psychological profiling and eyesight and hearing tests. In addition to this, officers suffering from particular medical conditions (ie insulin dependant diabetes or heart complaints) are prohibited from applying for, or continuing with, firearms duties. These physical, medical and mental health criterion are based on medical advice and national standards. They are designed to protect the health and wellbeing of the officer, their colleagues and the wider public. Such discrimination can be justified as the risk of allowing officers who are not physically or mentally fit enough to carry and potentially use firearms could have serious consequences for not only those officers, in terms of them losing their job or liberty or their own life, but also for their families, in terms of the impact on their lives, their colleagues and the wider public, in terms of the risk of them being injured or killed.

Outside the MPS: Although the SOP does not target individuals on the basis of disability, much work has been done to educate and inform armed officers of the impact of mental health and learning disabilities on a persons interaction with an armed officer. The training of armed officers now involves input from mental health professionals. Armed officers are encouraged to involve medical professionals and/or the friends and family of a person who is the target of an armed policing operation and who is suspect to be suffering from some form of mental illness. The language used within the SOP has also been revised and reviewed so as to ensure it does not cause unintentional offence to any persons.

Gender

General: The SOP does not discriminate against or actively target people on the basis of their gender.

Within the MPS: The MPS armed commands continually review the recruitment and retention of female officers in an attempt to create a more balanced profile within the workplace. A mentoring process exists to support female officers through the application process and fitness testing of armed officers. All firearms officers are expected to undergo the same selection procedures and to reach the same levels of fitness in order to achieve and maintain this status.

Outside the MPS: It is recognised that the majority of firearms operations target male suspects. However, this is due to the fact that men are more likely to carry and be involved in the use of firearms. The SOP emphasises the reliance on intelligence in planning and carrying out firearms operations.

Gender Reassignment
The SOP does not discriminate against any person, either within the MPS or outside of it, who has undergone or is intending to undergo gender reassignment.
Marriage and Civil Partnership (employment only)
The SOP does not discriminate against any person, either within the MPS or outside of it, on the grounds of their marital status.
Pregnancy and Maternity
General: The SOP does not discriminate against or actively target people on the basis of pregnancy and maternity.
Within the MPS: The SOP does not actually refer to pregnancy and maternity issues. This is a subject that will be considered as part of the forthcoming June 2011 review of the SOP. MPS policy on pregnancy directs that a full risk assessment should be carried out by an officer's line manager as soon as an officer notifies the MPS that she is pregnant. There is an expectation that this risk assessment would lead to the officer being removed from firearms duties, as the risks posed both to her own health and that of her unborn child would be too great for her to continue. There are also issues regarding the levels of lead in firearms. There are no specific guidelines as to when an officer can return to active firearms duties after giving birth or suffering a miscarriage. However, the officer would have to pass the fitness test standards prior to being returned to AFO status. These guidelines are in place to protect the health and wellbeing of the officer.
Outside the MPS: The MPS does not discriminate or actively target women who are, or have been, pregnant.
Race
General: The SOP does not discriminate against or actively target people on the basis of their race, colour or ethnicity.
Within the MPS: The MPS armed commands continually review the recruitment and retention of BME officers in an attempt to create a more balanced profile within the workplace. A mentoring process exists to support BME officers through the application process and fitness testing of armed officers. All firearms officers are expected undergo the same selection procedures and to achieve the same standards of fitness in order to reach and maintain this status.
Outside the MPS: The MPS recognises that there is a perception within some communities (noticeably the black, Asian and Middle Eastern communities) that they are disproportionately targeted by armed officers. Every armed operation is based on intelligence. The colour and ethnicity of subjects in an armed operation is recorded and is monitored both by the FPU and the Home office. Training for firearms officers has been developed to help firearms officers to consider the impact of their actions on a particular section of the community and how any negative impact might be mitigated. Significant improvements have been made in the relationship between the armed commands and the communities they serve. Much of this has been achieved through better communication and consultation both prior to and after an armed operation and a greater involvement of community members in the IAGs that interact with the armed commands.
Religion and Belief
General: The SOP does not discriminate against or actively target any person on the grounds of their religion or belief. However, Sikh officers are actively affected by the SOP.
Within the MPS: Sikh officers who wear turbans are actively discriminated against in the SOP. This is because it is not possible to wear protective headgear over the top of a turban and the turban offers no ballistic protection. Officers are provided with the option of wearing a patka (a smaller head covering), which may be worn underneath ballistic protective headgear. Sikh officers who refuse to remove their turban would not be permitted to apply for firearms duties. This is a national policy and is designed to protect the safety of the officer. It is necessary to ensure that a Sikh officer is not put at unnecessary risk.
Any other officer wearing a religious head covering would be required to remove this covering if it could not be worn underneath ballistic protective headgear.
Outside the MPS: The MPS recognises that there is a perception within some communities (noticeably the Muslim community) that they are disproportionately targeted by armed officers. Every armed operation is

<p>based on intelligence. Training for firearms officers has been developed to help firearms officers to consider the impact of their actions on a particular section of the community and how any negative impact might be mitigated. Significant improvements have been made in the relationship between the armed commands and the communities they serve. Much of this has been achieved through better communication and consultation both prior to and after an armed operation and a greater involvement of community members in the IAGs that interact with the armed commands.</p>
<p>Sexual Orientation</p>
<p>The SOP does not discriminate against any person, either within the MPS or outside of it, on the grounds of their sexual orientation.</p>
<p>Other Issues</p>
<p>There are no other issues to consider at this time.</p>

<p>7. Monitoring – see step 7 of the guidance</p>
<p>a) How will the implementation of the proposal be monitored and by whom?</p>
<p>The CO5 Firearms Policy Unit (FPU) is responsible for the monitoring of the SOP. A housekeeping review and a more in depth review are conducted each year. Each armed command also has responsibility for feeding back organisational learning regarding armed policing and the general application of the SOP to the FPU.</p>
<p>b) How will the results of monitoring be used to develop this proposal and its practices?</p>
<p>On some occasions feedback will be incorporated directly into the SOP. In other cases the feedback will trigger a review of a particular section of policy or practice or further consultation period.</p>
<p>c) What is the timetable for monitoring, with dates?</p>
<p>This EIA will be reviewed every three years. The SOP will undergo a full and in depth review every year. This will take into consideration learning from official investigations and inquests in addition to matters of organisational learning and feedback from all sources. This review will normally take place in the middle of the calendar year. A housekeeping review will take place at the beginning of each calendar year. Changes in legislation, national practice and MPS practices will be incorporated into the SOP as and when they are required.</p>

<p>8. Public Availability of reports / result – see step 8 of guidance</p>
<p>What are the arrangements of publishing, where and by whom?</p>
<p>This SOP is freely available to members of the MPS on the FPU intranet site. A redacted version (sensitive information removed) is available for public viewing on request. This EIA will be stored on both the FPU intranet site and on the FPU shared drive.</p>