



Data Rights
PO Box 313
Sidcup
DA15 0HH

Email: DataRights@met.police.uk

www.met.police.uk

Your ref:
Our ref: 01/FOI/26/055460/F

01/10/2026

Dear Derrick Lynch,

Freedom of Information Request Reference No: 01/FOI/26/055460/F

We write in connection with your request for information which was received by the Metropolitan Police Service (MPS) on 23/09/2026. We note you seek access to the following information:

PURPOSE OF THIS CORRESPONDENCE

I acknowledge that the Metropolitan Police Service has now made its decision following the internal review concerning FOI Reference 01/FOI/26/051190/I.

I am not asking the MPS Data Rights Unit simply to conduct the same internal review again.

I am asking the Metropolitan Police Service to identify and answer the substantive matters which remain unanswered following that decision, and, where a matter falls outside the functions of Data Rights, to identify the appropriate department and ensure that the matter is referred appropriately.

The internal-review response itself expressly states:

"This response will focus on the Freedom of Information response provided to you on the 06/03/2026."

That limitation is important because my previous correspondence also requested:

- 1. preservation of operational records;*
- 2. a written explanation of the operational rationale for the officers' deployment and decision-making; and*
- 3. an equality and safeguards review concerning the operational decision-making.*

Those matters cannot, in my understanding, be treated as answered merely because the FOI internal review has now been completed.

A. THE BENBOW DISCLOSURE

The MPS has now disclosed the redacted 2022 Benbow Protocol — A Joint Policing Protocol for Major Events and Disorder in London.

The disclosed document confirms that Benbow is a formal arrangement involving the Metropolitan Police Service, City of London Police, British Transport Police and Ministry of Defence Police and that it applies to specified cross-border and major-event circumstances.

The formal agreement further states that each force normally maintains strategic and tactical command of its own personnel in its own force area, but that qualifying operations may be designated as Benbow operations and officers assigned to them may then operate under a unified command structure.

This disclosure therefore creates further questions which require clear answers.

B. QUESTIONS CONCERNING THE ACTUAL DEPLOYMENT

Please answer each question separately:

- 1. Was the City of London Police deployment which is the subject of my correspondence a Benbow operation: YES or NO?*
- 2. If YES, on what date and at what time was it designated a Benbow operation?*
- 3. Who or what office authorised that designation?*
- 4. What recorded information evidences that designation?*
- 5. Under whose strategic, tactical and operational command were the City of London Police officers acting?*
- 6. What was the Gold command arrangement?*
- 7. What was the Silver command arrangement?*
- 8. What was the relevant Bronze command arrangement?*
- 9. Was the Metropolitan Police Service informed in advance of the deployment?*
- 10. Was MPS authorisation, agreement, notification or coordination required?*
- 11. Was any such authorisation, agreement, notification or coordination actually obtained?*
- 12. What records exist showing this?*
- 13. If the deployment was not conducted under Benbow, what other statutory power, protocol, mutual-aid arrangement, agreement, policy, operational procedure or policing arrangement governed the deployment?*
- 14. Who authorised the City of London Police officers to undertake the particular activity in Metropolitan Police territory?*
- 15. What was the recorded operational purpose of the deployment?*
- 16. What written tasking existed?*
- 17. What briefing was provided?*
- 18. What risk assessment was undertaken?*
- 19. What supervisory authorisation existed?*
- 20. Which force retained operational responsibility for the officers?*
- 21. Which force was responsible for any complaint concerning decisions made during that deployment?*

These are not requests for speculation. I am asking for identification of the actual decision-making framework governing the actual deployment.

C. APPARENT GAP BETWEEN QUESTIONS 1 AND 2

The internal-review decision states that, regarding Question 1, the MPS does not hold information that would answer the question.

However, in response to Question 2, the MPS has disclosed the Benbow agreement.

I therefore request clarification:

22. Does the MPS maintain its position that it holds no recorded information whatsoever concerning the legal basis, approvals and procedures by which CoLP officers may operate within the MPS area, other than material disclosed in response to Question 2?
23. If that is not the MPS's position, precisely what distinction is the MPS drawing between the information sought under Questions 1 and 2?
24. Which organisation would ordinarily hold the operational policies or procedures sought under Question 1?
25. Does the MPS contend that City of London Police alone would hold them?
26. If another body is believed to hold them, please identify that body.

E. EQUALITY SAFEGUARDS AND ANTI-BLACK RACISM

I am a Black person.

I am concerned about anti-Black racism and Institutional Racism within police decision-making processes. I am also concerned about the history and continuing public concern surrounding deaths of Black people following or during police custody or contact.

I make no allegation, no accusation, no assertion, no assumption and no conclusion that anti-Black racism or Institutional Racism determined the decisions concerning me.

My question is instead about safeguards.

I therefore require the Metropolitan Police Service to identify the safeguards against anti-Black racism and Institutional Racism that existed and were applicable at the material time, rather than merely supplying general statements about equality.

Please answer:

41. What safeguards against anti-Black racism existed within the relevant operational decision-making process?
42. What safeguards against Institutional Racism existed?
43. Were those safeguards applicable to the decision to deploy officers?
44. Were they applicable to decisions concerning the number of officers deployed?
45. Were they applicable to the decision to send officers to a private residential address?
46. Were they applicable to risk assessment?
47. Were they applicable to supervisory authorisation?
48. Were they applicable to cross-force deployment decisions?
49. Were they applicable to decisions made under Benbow, if Benbow was relevant?
50. What document establishes each safeguard?
51. What version of each relevant document was in force at the material time?
52. Which person or office was responsible for ensuring compliance?
53. Is compliance recorded or auditable?
54. Was compliance actually recorded in relation to this deployment?
55. Was any equality impact assessment, equality consideration, disproportionality assessment or equivalent safeguard undertaken?

56. Was race recorded or considered within any operational risk assessment concerning me?
57. If race was considered, for what lawful operational purpose?
58. If race was not considered, what safeguard existed to identify the possibility of unconscious, structural or institutional racial bias entering the decision-making process?
59. Was any supervisor required to challenge potentially stereotypical assumptions concerning a Black person?
60. What mechanism existed for doing so?
61. Was that mechanism used in this case?
62. Does the MPS have any specific safeguard expressly directed at anti-Black racism, rather than generic equality, diversity or inclusion?
63. Does the MPS have any specific operational safeguard expressly directed at Institutional Racism in police decision-making?
64. If the answer to either question is NO, please state NO expressly for the record.

F. AN IMPORTANT QUESTION ARISING FROM THE BENBOW DOCUMENT ITSELF

The disclosed Benbow Protocol expressly says that participating forces are committed to preserving individual and group rights, particularly peaceful assembly and freedom of expression.

Accordingly:

65. What mechanism within Benbow ensures that those rights are actually considered during operational decision-making?
66. Is there a documented equality safeguard within Benbow?
67. Is there a documented safeguard against discriminatory deployment decisions?
68. Is there a documented safeguard specifically concerning racial disproportionality?
69. Is there a documented safeguard against anti-Black racism?
70. Is there a documented safeguard against Institutional Racism?
71. If such safeguards are contained within the portions withheld under section 31 FOIA, will the MPS confirm their existence or non-existence without disclosing operationally sensitive details?

That last question is particularly important. The MPS may contend that operational details cannot be released, but that does not necessarily answer the separate question of whether a specified category of safeguard exists at all.

G. RESPONSIBILITY FOR THE UNANSWERED MATTERS

Finally:

72. Which of these questions are properly matters for Data Rights?
73. Which are operational policing matters?
74. Which are complaint matters?
75. Which are Professional Standards matters?
76. Which concern MPS equality or race-related governance?
77. Which should instead be answered by City of London Police?
78. Where the Data Rights Unit is not competent to answer a question, will it forward that question to the competent MPS department rather than treating it as answered?
79. If it will not forward the matter, please identify the department, postal address and email address to which it should be directed.
80. Please confirm whether the MPS considers any of the substantive operational,

preservation or equality/safeguarding matters recorded above to have already been finally determined.

81. If YES, identify the decision, decision-maker, date, reference number and document containing that determination.

82. If NO, please confirm that those matters remain outstanding notwithstanding completion of FOI Internal Review 01/FOI/26/051190/I.

REQUIREMENT FOR COMPLETE ANSWERS

These questions are not rhetorical.

I take each question seriously.

I request a question-by-question response. Where the answer is capable of being given YES or NO, please begin with YES or NO and then provide any necessary explanation.

If the Metropolitan Police Service cannot answer, will not answer, considers that it should not answer, does not hold the relevant information, considers another organisation responsible, or relies upon some other reason for not answering, please state that position expressly against the individual question and provide the reason.

I do not want unanswered questions to be treated as answered merely because the FOI internal-review process has concluded.

I intend to retain the response as a formal record and to report the outcome accurately to my family and community.

For the avoidance of doubt, my questions concerning anti-Black racism and Institutional Racism are requests for information and safeguards. I make no allegation, no accusation, no assertion, no assumption and have reached no conclusion that any individual officer or organisation acted because of racism.

The purpose is to establish what safeguards actually existed, whether they applied, whether they were used, and what documentary record demonstrates that fact.

All substantive communications should be provided in writing.

This is to inform you that the MPS are unable to proceed with your request as we require further information from you.

1) Please confirm precisely what City of London Police deployment you are interested in?

We would also like to remind you that the Freedom of Information Act is for recorded information only. Therefore, we are unable to answer any questions that require an opinion or view to be offered.

After receiving your reply, your request will then be considered and you will receive a response within the statutory timescale of 20 working days.

However, if the requested additional information has not been received by **21/10/2026** we will assume you no longer wish to proceed with this request and will treat it as withdrawn.

Should you have any further enquiries concerning this matter, please contact us using the email or postal addresses at the top of this document, quoting the reference number for this request.

In respect of your **Questions 27-40**, we can confirm that preservation requests are not within the remit of Data Rights under the Freedom of Information process. All policing data is subject to national retention policies set by the College of Policing under the Management of Police Information (MoPI). Where necessary, Data Rights will endeavour to preserve data requested specifically for a Right of Access request where it may otherwise be at risk of deletion under retention policies. However, preservation requests in relation to other proceedings/ contemplation of other proceedings should be directed as follows:

- If preservation is required for future legal proceedings, then a Civil Procedure Rules compliant letter of claim should be directed to the Directorate of Legal Services (DLS).
- If preservation is required for complaint proceedings, the request should be directed to the Directorate of Professional Standards (DPS).
- The contact details for DLS are: DLSMailbox-Allocations@met.police.uk
Metropolitan Police Service, Directorate of Legal Services, 10 Lambs Conduit Street London WC1N 3NR

You can raise preservation requests for complaints via the MPS website: <https://www.met.police.uk/fo/feedback/complaints/complaints/>.

- If the preservation request relates to a criminal matter and does not fall within the remit of Data Rights, Directorate of Professional Standards or the Directorate of Legal Services, please redirect your preservation request to the officer in charge of the relevant criminal case, who will be best placed to assist you further.

LEGAL ANNEX

Section 1(3) provides:

- (3) Where a public authority
 - (a) reasonably requires further information in order to identify and locate the information requested, and
 - (b) has information the applicant of that requirement, the authority is not obligated to comply with subsection (1) unless it is supplied that further information

COMPLAINT RIGHTS

Are you unhappy with how your request has been handled or do you think the decision is incorrect?

You have the right to require the Metropolitan Police Service (MPS) to review their decision.

Prior to lodging a formal complaint you are welcome to discuss the response with the case officer who dealt with your request.

Complaint

If you are dissatisfied with the handling procedures or the decision of the MPS made under the Freedom of Information Act 2000 (the Act) regarding access to information you can lodge a complaint with the MPS to have the decision reviewed.

Complaints should be made in writing, within forty (40) working days from the date of the refusal notice, and addressed to:

FOI Complaint
Data Rights
PO Box 313
Sidcup
DA15 0HH
DataRights@met.police.uk

In all possible circumstances the MPS will aim to respond to your complaint within 20 working days.

The Information Commissioner

After lodging a complaint with the MPS if you are still dissatisfied with the decision you may make application to the Information Commissioner for a decision on whether the request for information has been dealt with in accordance with the requirements of the Act.

For information on how to make application to the Information Commissioner please visit their website at www.ico.org.uk. Alternatively, write to or phone:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113

Yours sincerely,
Data Rights