**I am writing as a member of the public to raise my concerns regarding the Serious Violence Reduction Orders outlined in this consultation.**

StopWatch, a coalition of academics, activists, young people and lawyers, working towards fair, effective and accountable policing, have raised important concerns that I share:

* The Police and Criminal Evidence Act 1984 outlines how the vast majority of stop and search powers in England and Wales must be used[[1]](#endnote-1) – crucially, that officers require ‘reasonable suspicion’ to conduct searches. Previous conviction history is explicitly excluded from such reasonable suspicion.[[2]](#endnote-2) These proposals subvert this legal safeguard on the use of stop and search. Indeed, in 2010, the European Court of Human Rights ruled that search powers introduced through section 44 of the Terrorism Act 2000 were unlawful precisely because these powers did not meet this standard of reasonable suspicion.[[3]](#endnote-3)
* BAME communities – particularly young, black men – are searched at significantly higher rates than white people.[[4]](#endnote-4) It is highly likely that these powers will only worsen these already unacceptable disparities. Policing research suggests that as discretion in police stop and search practice is increased, racial disparities worsen.[[5]](#endnote-5) For example, suspicionless Section 60 search powers have resulted in some of the most egregious racial disproportionalities in all policing; StopWatch analysis of police data found that in 2018/19, black people were searched under Section 60 at almost 45 times the rate of white people.
* Evidence suggests increasingly punitive stop and search powers do little to reduce violence. [[6]](#endnote-6)A successful public health strategy for reducing serious violence as demonstrated in Scotland[[7]](#endnote-7) and endorsed by the World Health Organisation[[8]](#endnote-8) should be considered.

**I object to these proposals.**

1. Home Office. 2015. PACE Code A 2015. [↑](#endnote-ref-1)
2. Home Office. 2015. PACE Code A 2015. p. 6. [↑](#endnote-ref-2)
3. Equality and Human Rights Commission. 2010. Stop and think: A critical review of the use of stop and search powers in England and Wales. [↑](#endnote-ref-3)
4. Gov.uk. 2020. Police powers and procedures, England and Wales, year ending 31 March 2020. <https://www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2020>; BBC Politics London. Aired 1 March 2020. https://www.bbc.co.uk/programmes/m000g1bh [↑](#endnote-ref-4)
5. e.g. Bowling, B. and Marks, E., 2017. The rise and fall of suspicionless searches. King's Law Journal, 28(1), pp.62-88. [↑](#endnote-ref-5)
6. Delsol, R. (2015) ‘Effectiveness’ in R. Delsol and M. Shiner (eds) Stop and Search: The Anatomy of a Police Power, Basingstoke: Palgrave Macmillan; Ward, L., Nicholas, S., and Willoughby, M. 2011. An Assessment of the Tackling Knives and Serious Youth Violence Action Programme (TKAP) – Phase II, London: Home Office; https://www.gov.uk/government/publications/an-assessment-of-the-tackling-knives-andserious-youth-violence-action-programme-tkap-phase-ll; McCandless, R., Feist, A., Allan, J. and Morgan, N. 2016. Do Initiatives Involving Substantial Increases in Stop and Search Reduce Crime? Assessing the Impact of Operation BLUNT 2, London: Home Office https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/508661/stop-search-operation-blunt-2.pdf. [↑](#endnote-ref-6)
7. Scottish Government. n.d. Crime prevention. https://www.gov.scot/policies/crime-prevention-and-reduction/violence-knife-crime/ [↑](#endnote-ref-7)
8. World Health Organisation. n.d. Violence and injuries. https://www.euro.who.int/en/health-topics/disease-prevention/violence-and-injuries/violence-and-injuries [↑](#endnote-ref-8)