



Fairfield Independent Review

ethical and safeguarding framework

The Metropolitan Police Service (MPS) and the Mayor's Office for Policing and Crime (MOPAC) have jointly commissioned the Fairfield Independent Review. This Review is an independent review of the MPS, looking at what progress the service has made since Baroness Casey's Review into the standards of behaviour and internal culture of the MPS in 2023. Dr Gillian Fairfield has been appointed independent chair of the review, which was announced on 17 December 2025.

In light of the Casey Review recommendations, the MPS has outlined its priorities for reform, its commitment to Londoners, and its mission of *More Trust, Less Crime, and High Standards*. As set out in our [Terms of Reference](#), one of our key activities will be to *'listen to and engage with current MPS officers and staff, statutory partners, community representatives and the public to understand their experiences of, and confidence in, the MPS reforms'*.

Meaningful engagement is therefore central to generating robust findings and practical recommendations, but it must be conducted responsibly. To be effective and credible, engagement must be safe, inclusive, and underpinned by a robust ethical framework designed to *'do no harm'*. This framework protects participants, builds trust, and strengthens the legitimacy of the Review's work. It ensures that the Fairfield Independent Review maintains the highest standards of independence, confidentiality, participant protection, and inclusivity while gathering the evidence needed to assess the MPS' progress against the Casey Review recommendations.

This framework sets out comprehensive principles and procedures for engaging with current MPS officers and staff, statutory partners, community representatives, and the public, applying the highest standards of participant protection and ethical integrity. At its core are commitments to do no harm, maintain independence from the MPS and MOPAC, and safeguard all those who choose to engage with the Review. These principles underpin the Review Team's engagement plan.

The framework covers nine key areas: [governance and accountability](#); [confidentiality and anonymity](#); [informed consent](#); [minimising personal and social harm](#); [managing disclosures](#); [safeguarding](#); [data protection and secure handling of information](#); [protection against bias](#); and [inclusivity](#). Each section explains what the principle means, why it matters, and the specific commitments and activities the Review will undertake.

Overarching principles:

All engagement activity will be conducted in accordance with:

- **Do no harm:** Engagement is designed to minimise the risk of re-traumatisation, protect participant wellbeing, and ensure ethical conduct throughout.
- **Independence:** The Review maintains genuine independence from the MPS and MOPAC. Any conflicts of interest will be managed impartially by the Review Team. To reinforce this independence and build public trust, all engagement materials will be branded with the Fairfield Independent Review visual identity, ensuring consistent recognition across all touchpoints.
- **Informed consent:** Participants will receive clear, timely information about how their data will be used, their rights, and the limits of confidentiality. This information will be published on the Review's webpage.
- **Confidentiality and anonymity:** Robust data protection and anonymisation protocols ensure that participants cannot be identified. Personal data is collected only where necessary, for example for Citizens' Engagement Forum sign-up, and anonymised during analysis. Quotations will be included in the final report only where consent has been provided (excluding Metropolitan Police Service Management Board members, the Mayor for London and Deputy Mayors). All quotations will be unattributed and carefully checked to prevent indirect identification through demographic or geographical details.
- **Managing disclosures:** Clear procedures are in place for handling disclosures relating to police conduct or safeguarding concerns. Any decision to disclose information to the MPS or another agency will be subject to a stringent test, balancing seriousness, risk of harm, confidentiality, legal obligations, and the need to maintain independence. Participant consent will be sought wherever it is safe to do so.
- **Safeguarding:** Procedures are in place for identifying and responding to safeguarding concerns involving children, vulnerable adults, or others at risk. The Review Team is legally obliged to report suspected terrorism, money laundering, or child abuse. Where concerns arise, appropriate referrals will be made to relevant authorities.
- **Proportionality:** Engagement will focus on individuals who actively choose to participate, using an expression of interest approach. There will be no cold-calling of members of the public.
- **Support:** Participants will be signposted to appropriate support services. Details will be listed on the Review website, shared at the end of the survey, and provided through debrief materials for Citizens' Engagement Forums and one-to-one sessions with Review team member(s).
- **Inclusivity:** Multiple engagement routes will be offered to ensure accessibility for Londoners with different needs, preferences, and levels of digital access. Materials will be trauma-informed. Engagement will actively seek to include voices that are less likely to be heard, supported by MOPAC's stakeholder networks.

- **Transparency:** Clear communication will be provided about the Review's purpose, how to participate, and how findings will be used. The Review Team will monitor expression of interest responses.

Governance and accountability

What it is: Governance defines the structures, roles, and accountability mechanisms that oversee the ethical conduct of the Review. It clarifies responsibility for decision-making, compliance monitoring, and the management of concerns throughout the process.

Why it is important: Clear governance ensures ethical standards are applied consistently and transparently. It provides accountability, clear escalation routes, and confidence in the integrity of the Review.

Our commitments and activities:

1. Appoint a dedicated Safeguarding Lead with appropriate training and clearly defined responsibilities
2. Establish clear escalation procedures with defined roles and responsibilities for ethical and safeguarding concerns
3. Maintain comprehensive records of governance decisions and actions
4. Ensure transparent reporting mechanisms for stakeholders and participants
5. Develop and adhere to clear terms of reference for all Review roles
6. Monitor all access communication channels, including the 'talk to us' inbox, open-text survey responses, and written submissions
 - Designated Review Team members will monitor communication channels on rotation during working days, Monday to Friday, 9am to 5pm
 - The Review Team will aim to identify and respond to safeguarding concerns within 1 working day and general enquiries within 2 working days
 - An automated reply will be sent in response to all emails received to the inbox confirming when the inbox is and isn't monitored (see previous bullet) and providing the contact details of support services (e.g. Samaritans and London-specific charities)
7. The Review Team will monitor the survey platform, written submissions and expression of interest completions regularly.
8. All activity will comply with UK GDPR and the Data Protection Act 2018

Confidentiality and anonymity

What it is: Confidentiality protects personal information from unauthorised disclosure, while anonymity ensures that individuals cannot be identified in outputs, reports, or data sharing.

Why it is important: Participants may face significant risks if their identities are disclosed, including retaliation, stigmatisation, or re-traumatisation. Strong protections are essential to enable honest and safe participation.

Our commitments and activities:

- Complete a Data Protection Impact Assessment (DPIA) before commencing data collection
- Brief all team members and third-party organisations on confidentiality obligations
- Offer anonymous (survey, written submissions) and non-anonymous (Citizens' Engagement Forums and one-to-one discussions with Review team member(s)) options for engagement/participation
 - The survey and written submission form will include guidance encouraging participants against including personal identifying information in free-text responses, noting this protects their anonymity
 - The online survey and written submission will include an explicit statement that the Review Team cannot respond to individual cases, including safeguarding concerns, given respondents' anonymity
- Use secure online platforms for all data collection
- Clearly explain limits to confidentiality to participants who have provided personal data (Citizens' Engagement Forum participants)
- Obtain explicit consent before sharing any potentially identifying information (e.g. locations, dates, names, specific incidents)
- **All quotes (other than those from the Metropolitan Police Services' Management Board, Mayor for London and Deputy Mayors) will be unattributed** and checked to prevent indirect identification through demographic or geographical details
- Assign unique participant codes and separate identifying data from testimony
- Redact identifying details in all outputs
- Restrict access to identifiable data and delete information after the agreed retention period
- Apply aggregation and suppression rules to prevent indirect identification through small numbers or unique characteristics
 - Survey results based on unreliably small sample sizes will not be reported, and any breakdowns that could risk the identification of individual participants will be suppressed or combined to protect anonymity

Informed consent

What it is: Informed consent is the process by which participants are provided with comprehensive information about the Review, including its purpose, their role, potential risks and benefits, and their rights. Participants must voluntarily agree to participate with full understanding of what their involvement entails.

Why it is important: Informed consent respects participants' autonomy and right to self-determination. It ensures that participants are making genuine choices about their participation rather than feeling coerced or misled. This is particularly crucial when working with individuals who may have experienced power imbalances and violations of trust.

Our commitments and activities:

- Develop clear, accessible information sheets for all engagement in plain language explaining the Review's purpose, methods, and use of findings
- Provide information in multiple formats as needed
- A dedicated 'talk to us' inbox will be monitored regularly (Monday-Friday, 9am-5pm) by the Review Team to respond to queries or concerns about the Review, confidentiality or participation. Where repeated queries or concerns arise, these will be actioned through:
 - Updates to the Review website content
 - Additions to the FAQ section
 - Clarification of information sheets or other participant-facing materials
 - This approach ensures consistent communication and enables the Review Team to identify where public-facing materials may need improvement to ensure informed consent
- Allow adequate time for participants to consider their involvement without pressure
- Ensure participants understand their right to withdraw at any time without penalty or explanation
- Ensure participants understand what will happen to their data, including retention periods and potential uses
- Obtain written consent for Citizens' Engagement Forums and one-to-one discussions with Review team member(s) using consent forms that clearly outline what participants are agreeing to.
- Quotations will only be included in the final report where consent has been explicitly provided by the participant
- Document all consent decisions and maintain records securely
- Implement a "consent as a process" approach, checking in regularly throughout participation

Minimising personal and social harm

What it is: This principle commits to identifying and reducing potential harms that could arise from any involvement in the Review (i.e. participation, facilitators, analysts), including psychological distress, social consequences, reputational damage, or adverse impacts on ongoing legal proceedings or relationships.

Why it is important: Participants may have already experienced harm. The Review must not compound this trauma or create new harms. Prioritising the wellbeing of all involved takes precedence over research objectives. Supporting wellbeing demonstrates a duty of care, respects the dignity of all those involved in the Review, and helps prevent re-traumatisation, which is essential for meaningful and safe engagement. Demonstrating genuine care for welfare builds trust and ethical legitimacy.

Our commitments and activities:

- Ensure all team members who are involved in engaging the public are trained to recognise signs of distress and respond appropriately, and are either trained in trauma-informed approaches or can refer to a dedicated team member who is
- Survey design considers previous surveys (e.g. MOPAC Public Attitudes Survey), where relevant, to reduce duplication and participant burden where possible
- Signpost to specialist organisations offering counselling, advocacy, legal support, and peer support for survivors
- Support services will be listed on the Review website, shared at the end of the survey on the final screen, and provided via a physical or online debrief sheet for Citizens' Engagement Forums and one-to-one discussions with member(s) of the Review team
- Where possible, alert specialist organisations/support services (e.g. victim support services, community organisations) of the review aims and timelines
- Provide clear advance information about potentially distressing topics
- Enable participants to pause or withdraw without explanation
- Include 'prefer not to say' options for all questions in the survey (except initial eligibility question) and allow survey exit at any point
- Offer flexible participation options (timing, location, format, ability to pause or stop, and interviewer attributes such as a female participant requesting a female interviewer)
- At the start of each Citizens' Engagement Forum, establish ground rules for respectful discussion
- Allow sufficient time for one-on-one discussions with Review team member(s) alongside the Citizens' Engagement Forum and provide breaks as needed
- Monitor unintended consequences of participation (e.g. impact on mental health) and adapt engagement materials where necessary

- Opportunity to withdraw consent within the specified timeframe (agreed and stated in DPIA, information sheet and consent form) for Citizens' Engagement Forum participants
- Consider the timing of publication to minimise harm to participants or communities

Managing disclosures

What it is: Managing disclosures refers to the procedures for responding when participants reveal information about ongoing harm, criminal activity, safeguarding concerns, or other matters that may require action beyond the scope of the Review. This includes both mandatory reporting obligations and ethical considerations about when to breach confidentiality. Where safeguarding concerns arise, appropriate referrals are made to relevant authorities.

Why it is important: The Review team may receive disclosures about ongoing abuse, imminent harm, or other serious concerns that create tension between confidentiality commitments and duty of care. Clear protocols ensure that appropriate responses are provided to protect individuals at risk while respecting participants' autonomy and maintaining trust in the review process.

Our commitments and activities:

- Agree to the circumstances that would require breach of confidentiality (the review team is legally obliged to report suspected terrorism, money laundering, or child abuse). For example:
 - We would breach confidentiality if a participant mentioned they were involved in or knew someone involved in acts of terrorism.
 - We would not breach confidentiality if a participant spoke to us about a non-criminal incident that happened over 5 years ago that involved a no longer serving Metropolitan Police Officer, and the incident does not meet the legal threshold to breach confidentiality.
- Unless such circumstance warrants a breach of confidentiality, all evidence gathered from the public will not be shared or reported on in such a way that it is possible to identify any participant (other than attributed quotes to members of the Metropolitan Police Service Management Board, the Mayor for London or Deputy Mayors).
- Establish clear protocols for different types of disclosures with appropriate escalation pathways
- Ensure all team members are trained on disclosure procedures and legal duties
- Establish and maintain relationships with external agencies (police professional standards, IOPC, social services) before the Review begins
- Provide support and supervision for Review team members receiving disclosures

- Clearly communicate limitations to confidentiality in information sheets and consent processes (i.e. when confidentiality has to be broken)
- Wherever safe and appropriate, discuss concerns with the participant before taking action, explaining what steps will be taken and why
- Balance reporting obligations with awareness of participants' potential complex relationships with authorities
- Respect participants' decisions about reporting where there is no imminent risk to self or others
- Coordinate with the Safeguarding Lead and legal advisors when responding to serious disclosures
- Document all disclosures and actions taken, maintaining appropriate records

Safeguarding protocol

What it is: The safeguarding protocol is a comprehensive framework designed to protect participants, research team members, and others from harm throughout the Review. It includes procedures for identifying risks, preventing harm, responding to concerns, and ensuring appropriate support is available.

Why it is important: Working with participants who might have experienced harm requires robust safeguarding measures to protect vulnerable participants, honour their experiences, and ensure the research environment is safe for everyone involved. A clear protocol provides structure and accountability while demonstrating commitment to participant welfare.

Our commitments and activities:

- Ensure all personnel in direct contact with participants have completed satisfactory DBS checks (or equivalent vetting)
- Citizens' Engagement Forums will include at least one facilitator who has been trained in trauma-informed approaches and has undergone safeguarding training before fieldwork begins, to manage sensitive topics, ensure all voices are heard, and have an awareness of unconscious bias
- All facilitators understand the safeguarding procedures and reporting obligations
- All analysts will have received the basic safeguarding training
- Consult relevant organisational safeguarding policies covering participants, the Review team, and any others involved
 - This will include established immediate response protocols for safeguarding incidents with clear escalation routes
- Signpost participants to support services by providing contact information to participants and team members for emotional support (e.g. Samaritans and London-specific charities)
 - This information will be available to participants via the Review webpage, privacy notices, expression of interest, written submission

and an automated message from the 'talk to us' inbox so participants can access the support service information 24/7

- Create safe physical environments for Citizens' Engagement Forums and one-to-one discussions with Review team member(s) (neutral locations, accessibility, privacy)
- Implement a buddy system for Review team members facilitating Citizens' Engagement Forums and holding one-to-one discussions with members of the public, with regular check-ins
- Ensure participants have multiple ways to raise concerns (anonymous, direct contact with Safeguarding Lead)
- Conduct regular safeguarding audits throughout the Review
- Maintain detailed incident logs and review all safeguarding concerns systematically

Data protection and secure handling of data

What it is: Data protection encompasses the legal and practical measures taken to safeguard personal information throughout its lifecycle, from collection through storage, processing, analysis, and destruction. This includes compliance with UK GDPR and Data Protection Act 2018.

Why it is important: Participants may share deeply personal and sensitive information that, if mishandled, could cause significant harm. Robust data protection prevents unauthorised access, breaches, or misuse of information. It demonstrates respect for participants' trust and fulfils legal obligations to handle personal data responsibly.

Our commitments and activities (see DPIA for full detail):

1. Conduct a Data Protection Impact Assessment (DPIA) before commencing data collection
2. Store all personal data on the Review Team's secure systems, which are fully compliant with GDPR and the Data Protection Act 2018
3. Use encryption at rest and in transit, two-factor authentication, and user access controls for all data storage
4. Implement role-based access permissions, restricting access to project team members only via dedicated project folders
5. Store participant contact details and identifiable information separately from notes of Citizens' Engagement Forums and one-to-one sessions with Review team member(s)
6. Prohibit Review Team members from downloading or storing personal data on personal devices
7. Use secure file transfer methods if data needs to be shared, with appropriate access controls, or encrypted secure file transfer
8. Ensure all third-party processors have appropriate data processing agreements in place setting out GDPR compliance requirements, security

measures, data retention periods, deletion procedures, and breach notification obligations

9. Ensure all staff are trained on data protection obligations and secure handling procedures
10. Notify the ICO and affected individuals in cases of potential data breaches
11. Provide clear privacy notices to all participants for each engagement method (survey, written submissions, Citizens' Engagement Forums and accompanying one-to-one sessions with Review team member(s)) explaining data handling, storage, retention, and limits to confidentiality (e.g. safeguarding disclosures, legal obligations)
12. Obtain written and verbal consent for Citizens' Engagement Forums and one-to-one sessions with Review team member(s)
13. For the survey and written submissions, obtain implied consent through completion and submission of the form after being provided with the privacy notice, plus explicit consent via tick box for use of anonymised quotes
14. Anonymise data at the earliest possible stage in the research process:
15. Delete all personal data within six months of project completion
16. Regularly review access permissions to ensure only current project team members have access to data
17. The Review Team will monitor all open-text survey responses, written submissions, and expression of interest forms for any identifying information or safeguarding concerns, with active redaction before analysis

Protection against bias

What it is: Protection against bias involves implementing measures to minimise prejudice, preconceptions, or systematic errors that could distort the collection, interpretation, or reporting of participants' experiences. This includes addressing Review team member bias, selection bias, and bias in analysis and presentation.

Why it is important: Participants' voices must be heard authentically without, as much as reasonably possible, distortion through Review team members' assumptions or agendas. Bias can lead to misrepresentation of experiences, invalidation of certain perspectives, or findings that serve institutional interests rather than truth-telling. Minimising bias strengthens the credibility and legitimacy of the Review.

Our commitments and activities:

- Citizens' Engagement Forums will include at least one facilitator who has been trained in trauma-informed approaches and has undergone safeguarding training before fieldwork begins, to manage sensitive topics, ensure all voices are heard, and have an awareness of unconscious bias

- Use multiple data collection methods to triangulate findings (survey, written submissions, Citizens' Engagement Forums, one-to-one sessions with Review team member(s))
- Implement semi-structured approaches in Citizens' Engagement Forums and one-to-one sessions with Review team member(s), allowing flexibility for participants to share what matters to them
- Apply diverse and inclusive sampling strategies
- Document methodological decisions and rationales transparently
- Clearly distinguish between participants' perspectives and researchers' interpretations in reporting

Inclusivity

What it is: Inclusivity ensures that the Review actively enables participation from diverse communities and individuals, removing barriers and creating accessible opportunities for all participants (aged 18+) to contribute their perspectives, regardless of background, identity, ability, or circumstances.

Why it is important: An inclusive approach ensures that the Review captures the full range of experiences, particularly from marginalised communities who may be most affected yet least heard. This strengthens both the legitimacy and accuracy of findings.

Our commitments and activities:

1. Conduct outreach to diverse communities through trusted intermediaries and community organisations where required to ensure diverse and representative participation as far as possible
 - The Review Team will utilise MOPAC's stakeholder list to support access to the diverse communities via grassroots and voluntary and community sector organisations
2. Use inclusive language and images in all materials and communications
3. Create accessible materials where requested
4. Ensure physical accessibility of all venues (wheelchair access, quiet spaces)
5. Offer flexible participation options (in-person, remote/online, written, multiple choice and open text survey responses)
6. Schedule Citizens' Engagement Forums at times that accommodate work, caring responsibilities, and religious observances
7. Monitor participation demographics throughout the Review to identify gaps and adapt communication and promotion strategies
8. Consider intersectionality in analysis, recognising how multiple identities shape experiences