

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
ADMINISTRATIVE COURT

BETWEEN:

THE KING on the application of
SEX MATTERS

Claimant

and

(1) NATIONAL POLICE CHIEF'S COUNCIL
(2) CHIEF CONSTABLE OF THE BRITISH TRANSPORT
POLICE

Defendants

WITNESS STATEMENT OF CATHERINE LARKMAN

I, Catherine Larkman, Director and National Policing Lead and Wales Co-ordinator of Women's Rights Network Ltd ("WRN"), Horley Green House, Horley Green Road, Halifax HX3 6AS will say as follows:

INTRODUCTION

1. I make this statement in support of Sex Matters' application for judicial review against the Defendants. The facts stated within this statement are within my own knowledge and belief save where otherwise stated. I have prepared this witness statement myself, with discussions with Sex Matters' solicitors over email.
2. I provided a statement, dated 17th December 2024 with regard to a previous iteration of a search policy by the British Transport Police. This was an accurate record of my personal experience and views, including as a serving police officer for over 31 years, from Constable to Superintendent. My views are unchanged from when I made that statement and I continue to rely on it.

3. My position with regard to the Women’s Rights Network (WRN) is also unchanged, since the provision of my earlier witness statement. This was outlined in paragraphs 3 and 4 of that statement.
4. I have prepared this statement, drawing upon my policing experience. My policing experience was summarised in paragraphs 5-9 of my previous statement. I have also drawn upon multiple conversations with serving police officers and staff, who have expressed their own serious concerns to me about the impact and legitimacy of the current search guidance. I have summarised these further, but also described them in paragraphs 51-55 of my previous statement.
5. WRN have undertaken work and research with regard to the position of UK police forces around searching. This is summarised in paragraphs 36-38 and 56-57 of my previous statements. We have also released two reports, State Sanctioned Sexual Assault¹ and Who Cares About State Sanctioned Sexual Assault² that dealt with a previous iteration of NPCC search guidance.
6. In this statement I will cover:
 - i) The content of the new NPCC search guidance
 - ii) The content of the new BTP search guidance;
 - iii) The ability of an officer to refuse to carry out a search;
 - iv) Consent outside of the existing legal framework;
 - v) Evidential issues;
 - vi) Knowledge of what is being consented to;
 - vii) Children;
 - viii) Sexual motivations and allegations;
 - ix) Annex L; and
 - x) Further views of serving officers and staff.

CONTENT OF NEW NPCC SEARCH GUIDANCE

7. In May 2025, I became aware that the National Police Chiefs Council (NPCC) had circulated new strip searching guidance. It was not published at that time and despite searching for it I

¹ [WRN SSSA Report 2023](#)

² [WRN SSSA Report 2023](#)

could not find a copy online. I was shown a copy by a serving officer, I cannot recall exactly when, but from reviewing my social media I believe this was on or shortly before 12 June 2025. The guidance is entitled ‘Interim Guidance – Searching by Transgender officers and employees of the Police and the Searching of Transgender detainees’³. This represented a new attempt to bring in an element of opposite sex searching by UK police forces. This guidance stipulated a new approach to those searches carried out by the police that extend beyond the most basic search. Most typically, these are searches termed ‘more thorough searches’ (MTS) that involve the removal of more than outer clothing, and searches involving the exposure of intimate body parts (EIP). Both these types of searches are carried out in accordance with the Police and Criminal Evidence Act 1984 (PACE), which also stipulates that they must be carried out by an officer of the ‘same sex’.

8. Within this interim guidance, I noted that:
 - a) Trans identifying officers and staff will search in accordance with their sex and PACE, but may also request an exemption from searching with no apparent career detriment;
 - b) Female officers and staff will be asked to carry out MTS and EIP searches on trans identifying males on a consensual basis, should these males request this. The same will apply for male officers and staff, who will be asked to carry out these searches on trans identifying females on the same basis. The guidance refers to this being consensual. I have noted though that Annex L, Code C of PACE also permits opposite sex searching for detainees in certain circumstances. I am not clear why a consensual search is being used, when Annex L may make provision for such searches;
 - c) Female detainees may therefore be searched by male officers and staff on a consensual basis. Male detainees may be searched by female officers and staff on the same basis.
 - d) Female officers and staff can refuse to carry out a search on a trans identifying male without apparent detriment to their career, and the same for male officers and staff on trans identifying females, and that the request to carry out this type of search cannot be made as a lawful order. The inclusion of this opt-out only makes sense if those writing or approving the guidance recognises that what is being asked is not reasonable and an opt-out therefore needs to be provided;

³ [2335-20205-npcc-interim-transgender-search-guidance-final.pdf](#)

- e) Trans identifying males can request an officer or staff member of each sex to carry out a search upon their person, dependent on their anatomical presentation, with one sex searching the top half of their body, and the other sex searching the bottom half. The guidance does not elaborate on what is meant by ‘dependent on their anatomical presentation’ or how this would be reliably ascertained in a practical policing situation by officers and staff.;
- f) The guidance refers to circumstances where there are difficulties finding a willing officer and must then be placed on ‘constant watch’. Constant watch involves an officer sitting outside the cell door watching the detainee at all times to ensure their safety and welfare. Where no officer can be found, they are then searched in accordance with their biological sex.
- g) In the above circumstances at f), several clear issues arise for officers and staff. The guidance refers to being searched in accordance with ‘lived gender’ but does not provide any assistance in determining what lived gender means or how it is to be reliably ascertained. The next issue is that ‘constant watch’ would deplete a team of one officer until a willing officer can be found. This places pressure on the team. The next issue is that it puts a significant amount of pressure on the officer being asked to be ‘willing’. Do they refuse and put more pressure on their team due to the deployment of an officer on constant watch, or do they acquiesce to help the team? Based on my own policing experience and that of the officers I speak to, they will acquiesce despite any feelings of discomfort. The final issue is – if no one is found and the search is carried out in accordance with PACE and by officers of the same sex, then why was all this necessary in the first place?

CONTENT OF NEW BTP SEARCH GUIDANCE

- 9. At the end of June 2025, the British Transport Police (BTP) published their own ‘Interim - Transgender and Non-Binary Search Guidance’. This document explicitly refers to MTS and EIP searches, and notes that both the officer searching, and the person being searched must be of the same sex. The guidance covers searches outside of custody and those within BTP custody facilities.
- 10. This guidance has a section entitled ‘Consensual Searches’. This section refers to persons being searched requesting an officer of the opposite sex to search them, where they ‘present in a

gender other than their biological sex’ they can ‘consent to a search being carried out in a manner which is outside of the requirements of the legal power’. The consensual search procedure outlined requires the agreement of an authorising officer, the searching officer and the person being searched, all agreeing to step outside of the legal framework of PACE to carry out the search. No definition or clarification is provided with regard to what ‘present in a gender other than their biological sex’ actually means. This absence of clarity leaves this term wide open to interpretation and likely to cause officers and staff significant difficulty and inconsistency in interpretation.

11. In paragraph 5.3 of that guidance however, it stipulates that ‘a detained person may consent to be searched outside the statutory requirement that the sex of the person searching is of the same biological sex as the person being searched, i.e. where the detained person indicates a preference to be searched by an officer of a biological sex in contradiction of the requirements of statutory powers’. The guidance goes on to refer to detained persons who are ‘transgender or non binary’ who may elect the sex of the officer they wish to search them.
12. This statement conveys two clear messages to me, and I would suggest to any officer or police staff member reading it. Firstly, that it is based on ‘preference’ and is therefore wide open to interpretation and abuse. Secondly, that BTP are being explicit that what they are asking their officers to do is to consent to act unlawfully. There is no other interpretation of ‘in contradiction of the requirements of the statutory powers’.
13. At paragraph 4.4 of that guidance, BTP dispenses with Annex L Code C of PACE, preferring instead to implement a ‘consensual’ regime for such searches. The reasons for doing this are not apparent to me on the information provided.
14. The guidance refers to the need for authorisation from an officer of the rank of Inspector for relevant MTS or EIP consensual searches, where these take place outside of custody facilities. Within BTP custody facilities, authorisation is to be sought for consensual searches from the Custody Sergeant.
15. The BTP guidance also includes provision for an individual to have an officer of each sex, searching different areas of their body, as part of a consensual search. This may include a male officer searching the bottom half of their body and a female officer searching the top half, or vice versa. This does not appear to be based on anatomical factors, but would be elected by the

‘transgender or non binary’ detainee. None of the legislation referred to by BTP within their search guidance defines these terms.

16. The BTP guidance makes reference to circumstances where an officer may not be comfortable carrying out such a search, may decline to do so, or withdraw consent during the search itself. In these circumstances, the guidance states there would be no career detriment or sanction to the officer.

THE ABILITY TO REFUSE TO CARRY OUT A SEARCH

17. I have noted the inclusion of a ‘no career detriment’ clause for an officer who does not wish to carry out an opposite sex search in both the NPCC and the BTP guidance. I have considered the likelihood of a female officer or staff member feeling able to freely refuse to carry out such a search without feeling adverse pressure to simply ‘get on with it’. The NPCC guidance additionally states that a ‘lawful order’ cannot be given to search in these circumstances. Therefore, this is entirely based on agreement given freely via consent.
18. I said in my first statement at paragraphs 41 and 42, that female officers would have difficulty refusing to carry out a strip search due to the disciplined nature of the service and a lack of experience and authority. I believe that this will remain the case even with the ‘no career detriment’ provision due to the factors that I outline below.
19. The majority of these searches will be carried out in custody environments within police stations. These can be extremely busy areas, with much pressure on officers and staff to ensure that the needs and the rights of detainees are met correctly and also recorded correctly. The ‘booking in’ procedure includes the collection of data and information on the detainee, whether a power to detain that person exists, an assessment of their fitness for detention, their overall welfare, the provision of their rights and the recording of their property. Such property, including items of clothing may be retained and held in safekeeping while they remain in detention. In addition, they will be searched, and this will entail an MTS or sometimes an EIP search.
20. Female officers and staff will feel an inevitable pressure to ‘get on with it’ for several reasons. The first of these relates to the nature of the environment and the emphasis on mitigating risk⁴.

⁴ [Detention and custody risk assessment | College of Policing](#)

Custody areas can often be, and are routinely, intensely busy and they carry significant risk⁵. It is not unusual to have ‘queues’ of prisoners waiting to be booked in⁶. Officers and staff working there will also have responsibility for ensuring that cell visits to check on, and maintain, the welfare of detainees are regularly made in accordance with PACE, will be taking detainees out of and placing them back into, their cells for interviews, solicitor consultations, and telephone calls, and will be constantly responding to calls from cells, among other duties. The detainees being brought in will have been arrested or requested to attend voluntarily, for a variety of suspected offences. These may include sexual offences and offences involving violence. A significant number of the detainees will have mental health issues and will be vulnerable. It would be inappropriate and unwise in many cases to carry out the interview of a detainee prior to any search taking place, due to the risk of concealed items and harm being caused. This adds to the pressure on all officers and staff to simply ‘get on with it’ so that clear issues of risk can be mitigated against.

21. Another area of added pressure is the detention ‘clock’. Ordinarily, any detainee, if their detention is authorised, can be held for a period of up to 24 hours in custody, with additional periods only being available upon authorisation in restricted cases. However, that period of time is subject to regular review to ensure that detention is still necessary, and the police are under an obligation here to be expeditious and to justify every moment that the detainee’s liberty is removed. Even for a relatively straightforward offence, that period of time can start to very quickly elapse. For instance, many detainees request a solicitor, one is then requested to attend the station and may not be immediately available, the officer in the case then has a meeting with the solicitor to provide disclosure of the case, the detainee will then have a consultation with their solicitor. This all happens prior to an interview taking place. All the while the detention ‘clock’ is ticking. Any refusal to search a detainee by an officer, will mean another officer having to be found, and this eats into the detention clock. Officers are very aware of this pressure.
22. For detainees under the influence of drink or drugs and therefore unfit to be given their rights, or to be interviewed at all, a period of time is necessary for them to become fit and this can take

⁵ [Report on an inspection visit to police custody suites in the Metropolitan Police Service - His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services](#)

⁶ The power to conduct a strip search under s.54 PACE and Code C is not limited to persons arrested in the community but is also available to an officer in order to conduct strip searches of male serving prisoners, should they be under arrest and meet the conditions of the provision.

many hours, again eating away into the detention clock. This is a very common factor with detainees. Another common factor that will create delay can be when a detainee needs to be seen by a medical practitioner while in custody to determine their fitness due to medical issues. In either scenario, the detainee would have to be searched prior to being placed in a cell, or alternatively would have to be placed on constant watch, which is resource intensive.

23. A detainee requiring an MTS or an EIP search cannot be housed in a cell safely, without the search first taking place and any items that they may use to harm themselves or others, or any evidential items, being located and removed. The teams that carry out these searches are often not large. A female officer or staff member who feels uncomfortable at searching a male detainee, would be unlikely to refuse to carry out a search. She would likely hide her discomfort and unease and carry out the search, in order to avoid inconvenience to her colleagues, or being seen as a troublemaker. She may also be very conscious that, if she refused, another female colleague would then be asked to carry out the search instead of her.
24. The disciplined nature of the police service and the prevailing culture within, is also a factor in an unlikely refusal to search. Policing is a public service role, and officers and staff are subject to a discipline code and standards of professional behaviour, including a requirement to treat others fairly and without discrimination. Officers and staff are conscious of the necessity not to breach these standards. They are also conscious of the demands on their own colleagues and the pressure to work effectively as part of a team. Standing out as the weak link on a team where risk and discomfort are to be expected, is not desirable. A refusal to carry out a search in an environment, where time, efficiency and safety are of the essence would be felt adversely.
25. With reference to the NPCC guidance stating that a direction to carry out an MTS or EIP search cannot be given as a 'lawful order', it is hard not to envisage circumstances in a rank structured organisation, where directions are most usually given by more senior staff to more junior ones, where a request to carry out such a search will not be felt as a 'lawful order' that had best be accommodated without complaint. This is not a case of an officer volunteering without pre-empting. An officer will need to be asked and agree. The reliability of that agreement being given without some duress being felt is at question.
26. Female officers are still a minority in the police service. The officers typically carrying out searches are mainly at constable level and are relatively young in service. 35.4% of the total

number of police officers across the 43 territorial forces of England and Wales are female⁷. This compares to under 23% of the total number of officers in BTP being female⁸.

27. MTS and EIP searches are also carried out prior to arrest and in many cases, the person detained may never be arrested at all as no items may be found. These searches are in the main carried out by officers of the rank of constable, many of whom are working in a response officer role. These officers are increasingly young in service and lacking in experience. In England and Wales as of 31 March 2025, 46,991 officers had less than 5 years of service, accounting for 32% of all police officers⁹. It is not feasible to expect that these officers would feel confident in expressing their discomfort in searching the opposite sex to a supervisory officer or even a colleague. This is particularly the case for female officers, who face the additional challenge of demonstrating that they are just as capable as their male colleagues.
28. They work in an environment increasingly subject to public criticism and complaint. Given the deeply personal and impactful nature of MTS and EIP searches, to expect that young and inexperienced female officers will feel sufficiently confident to firstly assert their refusal to search a male and secondly, to cause their colleagues the inconvenience of finding another female officer willing to carry out the search, is highly unlikely.
29. Female civilian staff employed within the custody environment manage and search detainees as a significant part of their role. They would also find it extremely difficult to refuse to carry out such a key aspect of their job, given the inconvenience and nuisance they would be perceived as causing to their colleagues.
30. Specifically with regard to ‘no career detriment’, acceptance and advancement in the police service happens in subtle and nuanced ways, as well as transparent ones. An officer who is seen as ‘awkward’, and ‘not a team player’ leaves herself vulnerable to being unsupported for career opportunities.

⁷ <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2024/police-workforce-england-and-wales-31-march-2024>

⁸ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F66a1215249b9c0597fdb044c%2Fpolice-workforce-mar24-tables-240724.ods&wdOrigin=BROWSELINK>

⁹ [Police workforce, England and Wales: 31 March 2025 - GOV.UK](https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2025)

31. Female officers also risk being labelled as ‘gender critical’ within a policing service that, with the exception of BTP, have not yet approved the Police SEEN staff network¹⁰. The NPCC, along with several individual forces that I am personally aware of, have consistently refused to accept the legitimacy of this staff network, which sends out a message to officers regarding the non-acceptability of gender critical, or sex realist views. It is also noticeable that the police service, led by the Chief Constables of all police forces, are still considering how to comply with the Supreme Court judgment in *For Women Scotland v The Scottish Ministers*.

CONSENT AND STEPPING OUTSIDE THE EXISTING LEGAL FRAMEWORK

32. I have noted that both the NPCC and BTP guidance would mean that the officer carrying out the search, and the officer authorising it, would have to give their consent in effect to depart from the provisions of PACE to carry out an opposite sex search. I consider this to be fraught with danger for several reasons, including protection of detainees, protection of officers and staff, and admissibility of evidence. I know it causes serving officers and staff serious concerns for the same reasons I have expanded in my statement. The BTP guidance specifically refers to the searches as being ‘outside of the requirements of the legal power’. In my view, officers are being asked to give their consent to act unlawfully.
33. While there are instances outside of the police where regular citizens can consent to certain acts taking place, I am at a loss why ‘consent’ would be used within the police where a statutory framework for searching already exists. In particular, Annex L of Code C already includes a provision for detainees to request a different sex of officer search them. I have further comments about Annex L Code C later in my statement.
34. Examples of ‘consent’ outside of the police service could include: a boxer consenting to be physically hit within a boxing match; a rugby player consenting to physical contact during a match; or some sexual practices between adults. Should this be a factor that is influencing the decision to introduce ‘consensual’ searches within the police service, I consider it to be inappropriate for several reasons.
35. The above examples where consent has been given are reliant on both parties being equals and under no compulsion to give ‘consent’. Indeed, the presence of compulsion or perceived

¹⁰ Police SEEN is an independent network of police officers and staff with gender critical views
www.policeseenuk.co.uk

pressure and duress is likely to negate true consent in these circumstances. In addition, sporting contests are between generally matched equals. A featherweight boxer giving consent to a boxing match with a heavyweight opponent would not ordinarily be countenanced, nor would a rugby match between under 12s and adult males. There would be a real imbalance of power in these circumstances.

36. Where 'consent' may be expressed by an individual detained prior to arrest, or subsequent to arrest in a custody area, that individual is already experiencing a significant imbalance of power and a restriction on their liberty to act freely. To suggest that consent in these circumstances is reliable and freely given without a degree of pressure being felt to comply makes no practical sense.
37. Many of the individuals dealt with by the police are vulnerable and mental health issues are common. Stepping outside the protection of legislation for these individuals is neither caring, nor sensible. While the guidance documents reference those with mental health issues, police officers will be acutely aware of this and will inevitably feel exposed to potential future litigation.

EVIDENTIAL ISSUES

38. Searches, whether MTS or EIP, may recover items that will be seized in evidence and produced at court. These items may include controlled drugs, weapons, stolen items, or other items used in the commission of an offence. Should an officer have stepped outside of the existing legal framework and carried out a search with 'consent', then this presents an obvious vulnerability for future court proceedings, where the 'consent' can be questioned, rendered unlawful, and put any case brought in jeopardy.
39. As EIP searches are not visually recorded on pre arrest cases, via the body worn video of officers, any withdrawal of 'consent' during this process by the detained person will not be captured. In addition, any potential sexual assault allegations during the conduct of the 'consensual' search will not be negated via video recording.

40. The NPCC require that body worn video should also be used to record stop search encounters, “unless there are exceptional and justifiable circumstances not to”.¹¹ The College of Policing also state within their Authorised Professional Practice¹² on stop search that:

“Where available, body-worn video (BWV) should be used in accordance with force policy. The standard approach is that BWV should be activated, so as to capture all relevant information in the time leading up to the person being detained for a search, the conduct of the search itself and the subsequent conclusion of the encounter”.

41. Where there is an exposure of intimate body parts, the College states that officers should record the audio of the stop search, but direct the camera away, or cover it. Searches carried out under the power of a warrant are recorded on that warrant documentation. Searches in custody are recorded on the custody record and CCTV systems are generally present in these environments. Of course, this is the case already for searches carried out under the existing statutory framework. However, where officers are being asked to consent to act unlawfully, the lack of corroborative evidence to support that the officer has acted correctly at all times becomes contentious.

KNOWLEDGE OF WHAT IS BEING CONSENTED TO

42. Police officers and police staff will be asked to consent to searches in circumstances where a detainee requests an officer of the opposite sex. In the case of the NPCC guidance, this is dependent on ‘anatomical presentation’ without explaining what is meant or how the ‘anatomical presentation’ will be determined. In the case of the BTP guidance, this appears based on preference alone. Considering the situation of female officers giving their consent, I query if they are being presented with the full picture of what they are consenting to. Explicitly, they do not know if they are searching a male who has undergone penectomy or orchiectomy, or a fully functional male, who may present with an erection. This risk appears not to have been considered in either guidance and no mitigations presented. Withdrawal of the officer’s consent during this experience does not mitigate against the risk and exposure she was presented with. This again presents a flaw in the concept of free ‘consent’ having been given.

¹¹ <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/local-policing-coordination-committee/2024/npcc-bwv-guidance-2024.pdf>

¹² <https://www.college.police.uk/app/stop-and-search/transparent>

CHILDREN

43. There is no reference in either the NPCC or BTP guidance on the process to be followed for children. I am unable to find any exemption to their being able to give ‘consent’ to be strip searched by the opposite sex. I have therefore presumed in the absence of specific reference to children, that they are also to be included within the scope of giving ‘consent’, with potentially the agreement of an appropriate adult responsible for their care and wellbeing.
44. PACE at present permits such children to consent to the appropriate adult present at a strip search to be of the opposite sex. This provision allows a male child to have his mother or other female relative or carer responsible for him, present. Similarly, it allows a female child to have her father, or another male relative responsible for her, present. There is an existing provision with regard to consent for searching purposes.
45. However, this provision presumably exists for practical and safeguarding reasons. Children are uniquely vulnerable. Children may well be detained who feel that they are the opposite sex and request accommodations be made with regard to this. Many parents affirm their child’s new-found ‘identity’ and may therefore support such a request that an MTS or EIP search be carried out by an officer of the opposite sex.
46. Children in care are also vulnerable and their appropriate adult may be a social worker. A recent report¹³ has found that social workers are predisposed to accommodate that child’s request, considering it to be in their interests. In these circumstances, the protections of PACE would be put aside, and this child be stripped and searched by an officer of the opposite sex.
47. Even where carried out with respect and dignity, searching is a very intrusive tactic. This was highlighted by Dame Vera Baird in *‘An independent report on the experience of people who are arrested and taken into custody by Greater Manchester Police with a focus on women and girls’*
- “The impact of strip searches can be severe. They are a profound invasion of people’s privacy and bodily autonomy. They are often experienced as humiliating and degrading”.*¹⁴

¹³ [Children in care ‘still being failed’ on gender ID](https://archive.ph/2nEYI), The Times, 24 August 2025 (https://archive.ph/2nEYI)

¹⁴ [The Baird Inquiry](#)

48. Similar comments were made in the Child Q case including by the Independent Officer for Police Conduct¹⁵ and by the Children’s Commissioner¹⁶. The Child Q case concerned a 15 year old girl wrongly accused of having drugs and being strip searched by the Metropolitan police, including having intimate body parts exposed, with no appropriate adult present.
49. In 2022, the search of another teenage girl, this time in the custody setting, was reported. In this case, the girl reportedly had her underwear cut off her while male officers looked on. Her lawyer reported that *"The strip-search needs to be done in front of same-sex staff only, not same-sex staff with the opposite sex on-looking. And that culture is set to protect your dignity, save you from embarrassment, and to put in order exactly how these things should be done correctly"*. The long-lasting traumatic impact upon this young girl was also highlighted¹⁷.

SEXUAL MOTIVATIONS AND ALLEGATIONS

50. I have made comments around sexual motivations of both detainees and officers and staff in my first statement. These are detailed at paragraphs 29-35, and 44-50. I cannot see any place within the NPCC or the BTP search guidance or their EIAs that takes account of the likelihood of this occurring and any adequate mitigations that could be put in place to prevent or minimise them. For an organisation that deals with sexual offending and sexual violence, and has also been blighted by findings of misogyny and the abuse of powers for sexual advantage within its ranks, this omission is extraordinary.
51. I have considered the findings of the report ‘An Inspection of Vetting, Misconduct and Misogyny in the police service’ by His Majesty’s Inspector of Constabulary and Fire & Rescue Services (‘HMICFRS’)¹⁸(2022) and the comments made by female officers and staff about misogyny, predatory behaviour and sexual assaults within policing. The report also describes the fears of female officers and staff and likely consequences of being ostracised and labelled a troublemaker if they do indeed speak out. I have made further comments below also about the relevance of the report by Baroness Casey in her review *‘An independent review into the*

¹⁵<https://www.policeconduct.gov.uk/news/iopc-calls-review-police-strip-search-powers-following-child-q-investigation>

¹⁶<https://assets.childrenscommissioner.gov.uk/wpuploads/2024/08/Strip-searching-of-children-in-England-and-Wales-2024.pdf>

¹⁷ <https://www.bbc.co.uk/news/uk-61523291>

¹⁸ <https://assets-hmicfrs.justiceinspectorates.gov.uk/uploads/inspection-of-vetting-misconduct-and-misogyny-in-the-police.pdf>

*standards of behaviour and internal culture of the Metropolitan Police Service*¹⁹, published in 2023.

52. I have also considered the Police Scotland Independent Review Group *Deep dive into Sex Equality and Tackling Misogyny and Violence Against women and Girls*²⁰. I note that this was only published via an FOIA in August 2025, but had actually reported in May 2024 and that concerns have already been expressed about a lack of transparency in publishing this²¹. The contents of this report describe a ‘culture of impunity’, where officers treat each other far more poorly than the public, of sexism, misogyny and predatory behaviour. Among many concerning findings, paragraph 37 stood out for me, which referred to ‘*A culture that does not serve women who are labelled as ‘troublemakers’ for raising concerns, diminishing their opportunities for promotion; unfair treatment, intimidation and bullying of those who raised a complaint, with little to no support from senior management or corporate services*’.
53. I have also particularly noted the findings in paragraph 41, with regard to female officers being subjected to inappropriate ‘jokes’ and comments by male officers more senior to them, and that female officers then attempt to modify their behaviour and appearance so as not to ‘provoke’ this treatment. I note that they feel discouraged from raising any concerns about such behaviour and reports of collusion with perpetrators.
54. Paragraph 45 refers to officers ‘*who had amassed a number of complaints and who were ‘informally’ known as both harbouring views and behaving in ways that were sexist and misogynistic, and who continued to work and receive promotions regardless of those complaints*’. This is indicative not only of a very toxic workplace environment, but one which clearly tells the female officers within it, that they will not be rewarded if they speak out, and in fact, those who behave badly will be rewarded. The report also highlights that these young female officers are not likely to receive support from more senior female colleagues too.
55. When I consider the findings, alongside other reports into police culture, such as the Casey Review and my own experience, it is evident that there is significant pressure on female officers and staff not to speak out, and significant consequences for them if they do. To therefore assume that their consent with regard to opposite sex searching, can be simply refused or withdrawn and

¹⁹<https://www.met.police.uk/SysSiteAssets/media/downloads/met/about-us/baroness-casey-review/update-march-2023/baroness-casey-review-march-2023a.pdf>

²⁰ [Police-Scotland-IRG-deep-dive-report.-May-2024.pdf](#)

²¹ [Report finds evidence of Police Scotland misogyny - BBC News](#)

that there will be no ‘career detriment’ is at best naïve and denies the findings of independent reports into police culture.

ANNEX L

56. I have referred at various parts of this statement to Annex L Code C of PACE. This states that a Gender Recognition Certificate (GRC) changes a persons legal sex, but additionally that a person must not be asked if they have a GRC, as well as that a person should be searched according to their ‘gender’. It also refers to ‘gender identity’ which is not defined in any way or have any legal foundation, and to ‘predominant lifestyle’, without providing any meaningful guidance for officers as to what this actually entails.
57. From speaking with officers and staff, Annex L Code C has caused confusion and concern. In my own experience, policing is a difficult, challenging and often chaotic area to work in. Officers and staff need clear communication and instruction, strong leadership and to feel that they are supported.
58. Officers have tried to apply this in good faith and with the best of intentions, in acting professionally, but have found the way in which this has been written has caused far more problems in interpretation and application than it has solved. Officers and staff have expressed views that all detainees should be searched as far as is possible in accordance with their actual sex as this is what PACE overwhelmingly says, and which they feel treats everyone appropriately.

FURTHER VIEWS OF SERVING OFFICERS AND STAFF

59. In paragraphs 51-53 of my previous statement, I summarised the concerns expressed to me by serving police officers and staff. I have continued these conversations with serving police officers and staff, and these have included the new NPCC and BTP search guidance. These have been included and reflected in my comments above. They can also be summarised as below:
- (i) They are concerned that what they describe as a zeal among senior officers to ensure opposite sex strip searching is implemented has overtaken all rational and practical considerations.

- (ii) They describe a culture in which senior officers are unable to admit that they have been wrong at any time. This includes the first iteration of opposite sex searching guidance based on self ID for officers and detainees alone which had to be suspended, and the second proposed iteration, which was to be dependent on the existence of a GRC, which was superseded prior to NPCC approval by the Supreme Court judgement in the case of *For Women Scotland v The Scottish Ministers*.
 - (iii) They describe a culture in which ‘gender critical’ views are tolerated at best by senior officers and that this, rather than operational need, has shaped the implementation of opposite sex strip searching guidance.
 - (iv) They are concerned that ‘consent’ will not be true consent and that officers and staff, particularly female ones, will feel pressured into complying for fear of unknown career or disciplinary consequences or disapproval of, or concern for impact upon, their team.
 - (v) They are concerned about the consequences of such impactful and intrusive searches taking place without the necessary legislative framework to support them, and about the potential consequences for both them and any evidential threats.
 - (vi) They are concerned about the impact upon vulnerable detainees, including trans identifying females and children.
 - (vii) They are concerned about predatory male officers who may seek to exploit these searches for sexual advantage.
 - (viii) They are concerned about unfounded allegations being made of sexual assault or impropriety.
 - (ix) They are concerned about predatory male detainees and requests being made for searches for reasons of sexual motivation and the exploitation of female officers and staff to meet these predatory sexual motivations.
 - (x) They wish purely to comply with the law and do their job professionally.
60. These officers and staff have once again reiterated to me that they consider the comments made by Baroness Casey, to equally apply across the culture of other police forces. They have

expressed that this is once again being demonstrated in the development of the latest iteration of the search guidance.

61. The Casey review speaks about internal misogyny, too much hubris and too little humility, defensiveness and denial, that speaking up is not welcome and of “not recognising predatory behaviour”. The officers and staff state that this is a theme across police force culture and that given their experience of this, they consider it highly improbable if not impossible, that ‘consent’ will be freely given without feeling that they are being compelled or directed to search.
62. While these officers and staff are aware that there has been some consultation in areas of policing, they consider that weight has been given in favour of those groups and individuals that favour opposite sex strip searching and that those leading on the development of this guidance have been determined to bring in a version of it at all costs. They are cognisant of Baroness Casey’s findings that:

“The organisation has a ‘we know best’ attitude. It dismisses external views and criticisms”;

“It does not embrace or learn from its mistakes. Instead, it starts from a position that nothing wrong has occurred”;

“Keeping your head down, looking the other way, and telling people – especially senior officers – what they want to hear is the way things are done in the Met. The culture of not speaking up has become so ingrained that even when senior officers actively seek candid views, there is a reluctance to speak up. Disciplined services such as policing might be more prone to such behaviours. This makes it all the more important that those who do speak up are supported, protected, and their contribution is valued. But those who speak up in the Met learn the hard way that there are adverse consequences for themselves, for their careers, and for their teams”.

63. Once again, they state that this is the prevailing culture across forces.

Statement of truth:

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: Cathy Larkman
Cathy Larkman (Aug 29, 2025 13:55:35 GMT+1).....

(CATHERINE LARKMAN)

Dated: 29 August 2025