



# **EQUALITY & INCLUSION STRATEGY**

Policing in the Square Mile  
2020 – 2025

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## Forward by the Force Equality and Diversity Champion

### Assistant Commissioner



### Alistair Sutherland

As the Force Equality and Diversity Champion I fully support this strategy as it represents our formal commitment to ensure we promote equality, diversity and human rights in everything we do, enhancing the value of the services we provide to the public and making sure the Force fully represents the society we serve.

It is very important that as a Force we drive continued focus on equality and inclusion in all of the services we provide. Whether that is the way we police our communities, the way we treat victims of crime or the culture of our workforce. By embracing and understanding the richness of our diverse community we can build and maintain trust and confidence, and enhance our own performance.

We will act on the evidence collected as part of the monitoring of this strategy to ensure that we continually learn and improve. My aim is to deliver excellence to the public and be seen as an employer that values the views, skills and expertise of everyone.

I fully support the delivery of this strategy and will work with senior managers and staff to ensure the principles of this document are cascaded across the Force and become the cornerstone of our vision.

## Force Vision

Our vision is to make the City of London the safest city area in the world, regarded as a centre of excellence for protective security. This is a key ambition of our Corporate Plan. We protect the people, businesses and infrastructure of the City of London, one of the most important, dynamic and challenging environments in the UK, whilst leading the national response to fraud. Delivering our national lead force responsibilities is a key element of our Corporate Plan.

Our Policing Plan and Corporate Plan aligns directly with the City of London Corporation's Corporate Plan's aim to support a thriving economy. We do this by leading on the physical security of the Square Mile, maintaining well established relationships with commercial and law enforcement partners locally, regionally, nationally and internationally. We also support the City Corporation's aim for a flourishing society by leading excellence in policing locally through to globally, delivering safer communities, preventing and combatting crime.

Our primary aim is to protect the people and infrastructure of the City of London, ensuring the Square Mile remains a safe and vibrant place to live, work and visit. The priorities outlined in this plan address these threats as well as the concerns raised by you, which includes antisocial behaviour and supporting victims of crime.

## Force Equality, Diversity, and Inclusion Vision

Our Force vision is to ensure that all communities, individuals, charities and businesses receive an excellent and consistent experience. Our Force engages with local, national and international communities across the globe, who all have diverse needs. **We know that we cannot achieve this vision without a high performing workforce that embraces diversity and inclusion at its core.** We have created this equality, diversity and inclusion strategy to set out how we will achieve this vision over the next 5 years.

## Context

During 2020 the City of London Police engaged an external consultancy to conduct a review of the Force's work thus far, complete a benchmarking exercise and lead listening exercises with staff. Out of this review this strategy and the accompanying action plan were written. This strategy has been shaped by:

- Best practice feedback from the Inclusive Employers Standard benchmarking audit
- Anonymous focus groups, 1:1 interviews, and an all-staff survey
- NPCC EDI strategies and toolkits
- Public Sector Equality duty reports including gender pay gap and staff demographic data
- Existing City of London Police work in this area including the BAME<sup>1</sup> action plan
- City of London Police Leadership principles
- National Police Code of Ethics
- Current best practice in inclusion and diversity

This strategy is intended as an overarching vision for inclusion and diversity in the Force, under which sits the action plan pulling together ongoing work, reporting requirements and development areas into one cohesive plan.

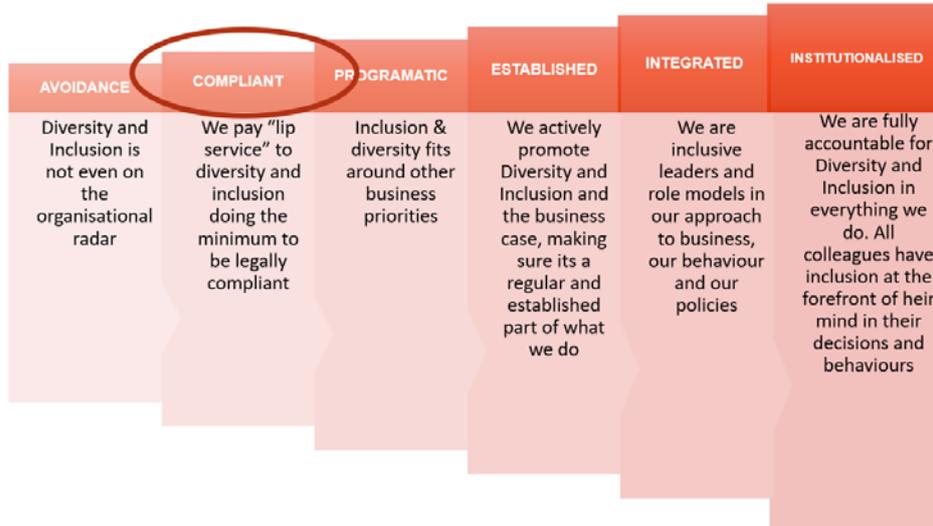
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<sup>1</sup> Please note that the term "BAME" is used here and elsewhere in the document as a form of shorthand and is in no way intended to be exclusive of individuals or groups whose needs and experiences as different ethnicities merit their inclusion. We are aware that the term is sometimes used in a way that excludes some minorities (such as Jewish, white Muslim, and ethnically Eastern European), and who have specific experiences and needs.

## 2020: Where we are now

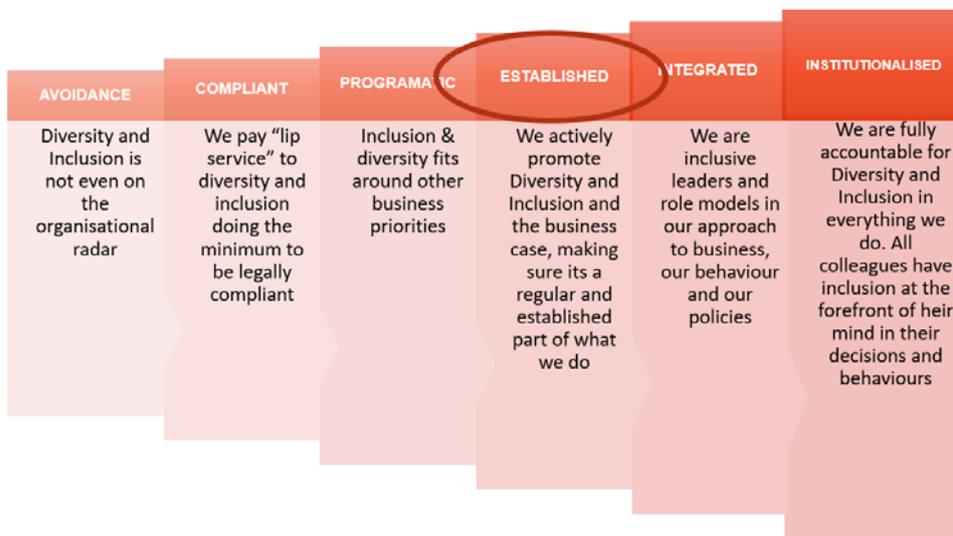
The benchmarking exercise and listening exercises conducted during Summer 2020 established that the Force is at the beginning of its inclusion journey. As shown in the diagrams below, the Force is currently at the ‘compliance’ stage of the inclusion maturity model:

### Where we are now: Inclusion Maturity Model



The benchmarking exercise found that the Force have a foundation of legal compliance in place, for instance PSED and gender pay gap reporting mechanisms, policies and procedures and staff training. In line with the Force vision to develop an inclusive, high performing workforce to deliver excellent service, we want to have progressed to ‘established’, moving towards ‘integrated’ by 2025:

### Where we aim to be by 2024: Inclusion Maturity Model



## The 6 pillars of an inclusive 21<sup>st</sup> century police force

We have framed our progress towards 'established' within 6 inclusion pillars in line with the Inclusive Employers Standard benchmarking audit. As we achieve the actions underneath each pillar we will move along the inclusion maturity model.

<b>Engage</b>	Engage staff (at all levels) to ensure they have a good understanding and awareness of the organisation's vision for diversity and inclusion. Engage with the staff so that the organisation has a good understanding of the employee experience from an inclusion perspective.
<b>Equip</b>	Equip all staff, managers and leaders through training, policies and guidance to build equality, diversity and inclusion into the work they do and the way they work. Equip all staff to help the organisation design and deliver more effective and inclusive policies, processes and services.
<b>Empower</b>	Empower by involving staff through networks, team discussions, Trade Unions and/or other channels. Value the contributions of everyone, including people from under-represented groups and ensuring inclusion and diversity makes a positive difference. Empower by providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities.
<b>Embed</b>	Build a shared responsibility and accountability for achieving improvements by explicitly embedding inclusion and diversity into everything the organisation does. This includes embedding inclusion and diversity into the organisation's corporate strategy, any processes and policies to improve its ability to attract and retain the best talent and through its procurement processes.
<b>Evaluate</b>	Evaluate diversity and inclusion progress to set relevant and achievable interventions/ targets.
<b>Evolve</b>	Evolve by continuously learning and drawing on best practice to devise innovative and creative interventions.

## Achievements so far

- Between 2018 and 2019 we have demonstrated progress in closing our Gender Pay Gap.
- We have continued to increase the amount of diversity data we publish in our Public Sector Equality Duty Report.
- We have reviewed all our Equality, Diversity and Inclusion (EDI) practices to allow more collaborative working with internal and external groups and organisations.
- We have reviewed the Terms of Reference for the Equality & Inclusion Strategic (E&I Strategic) Board which clearly sets out our expectation and responsibilities of all attending members.
- We have introduced a new Equality & Inclusion Operational Delivery (E&I OP Delivery) Board that is chaired by a Chief Superintendent / A/Commander. The E&I OP Delivery Board is attended by all the staff support networks, trade unions, Police Federation, HR, Learning & Organisational development and the Equality & Inclusion Manager. The actions and updates from the E&I OP Delivery Board are directly fed into the E&I Strategic Board for senior leadership support.
- We are re-launching the Superintendents' Scrutiny Group.
- We have recruited a diverse group of people who represent the City of London Residents, City businesses, the transient population and the greater London population, to be part of our new Independent Advisory Scrutiny Group.
- We have improved networking with external stakeholders and businesses, to learn and share new and effective EDI practices. We have introduced workshops and policies to support our employee's development and family life.

- Following the Black Lives Matter movement, we implemented a Gold Group and focus groups, to allow people to share their views and experiences, at work and at home. We will continue to ensure we create an inclusive and supportive environment for our organisation, our community and our partners.

## 2025 - What success looks like within the Force Values

### Force Values

Our values, which encompass the Code's nine principles, underpin everything we do. Adhering to them enables us to demonstrate not only our commitment to the national Police Code of Ethics, but also to deliver it.

**Integrity:** Our behaviour, actions and decisions will always support the public interest and those we work in partnership with. We value public trust and confidence in policing and to earn this we will be open to scrutiny and transparent in our actions. We will respond to well-founded criticism with a willingness to learn and change. We will ensure that the public can have confidence in the integrity of the data used and published by us; we will make sure that all crime is recorded ethically and in accordance with all current guidance.

#### What success looks like: integrity

- Transparent and accountable processes and practices that all staff trust
- Openness to feedback, learning and change to create a culture that includes everyone
- Senior staff that role model genuine inclusion

**Fairness:** We are an organisation that believes in openness, honesty and fairness. We believe in mutual trust and respect, and in valuing diversity in our role both as an employer and as a public service provider. We will support equality by creating an environment that maximises everyone's talents in order to meet the needs of the organisation and those of the community we serve.

#### What success looks like: fairness

- Fair and consistent procedures for recruitment, development and promotion
- A culture of mutual trust and respect between all levels and groups within the force, incorporating zero tolerance for bullying and harassment
- All staff feel they are treated with dignity and respect whatever their job role, identity or background

**Professionalism:** Professionalism is a quality that we value highly. We will investigate crime professionally and thoroughly, doing everything in our power to protect those at the greatest risk of harm. We expect our staff to be

dedicated to professional development, both for themselves and the people they are responsible for, and empowered to use discretion and common sense to make appropriate operational decisions. Our professionalism ensures that we meet the needs and demands of our customers to deliver high quality, fast, effective and efficient services

### What success looks like: professionalism

- Inclusion embedded into everything the force does, including training and development programmes, in line with the professional standards
- Empowered and skilled line managers for every team
- Rigorous mechanisms to report progress and ensure action in EDI

### How we will measure success

As noted previously, there has been significant work in inclusion at the Force, and this strategy is intended to work harmoniously alongside that ongoing work. We have identified the following overarching measures of success that all of this work, and additional actions identified in the action plan, will help achieve:

- Staff surveys demonstrating increasing levels of reported trust in the fairness, integrity, and professionalism of the Force, with the aim of engagement and trust levels being broadly equal across different demographic groups
- Engagement measures showing increased retention, reduced sickness absence, reduced staff complaints and grievances, with no demographic overrepresented within tribunals and grievances
- Increasing levels of staff diversity data disclosure rates, leading to 95% completion by 2025
- Achievement of Inclusive Employers Standard Bronze in 2022, and Silver in 2025
- Achievement of 'Good' assessments by HMICFRS for Legitimacy and any Diversity and Inclusion related inspections.
- Ambition for a workforce that represents the diversity of London, with measurable progress at every level arising from inclusive talent pipelines, positive action and workforce development programmes
- A suite of inclusive policies and procedures written in collaboration with key stakeholders including staff networks

- Provision of Inclusion & Diversity training for all staff, including an Allies programme, and training specifically for line managers to manage inclusive teams
- All staff to have meaningful EDI-themed objectives within their performance review

## Ensuring joined-up working

This strategy outlines the vision for inclusion in the City of London Police to create a high performing and inclusive 21<sup>st</sup> century police force. It is intended to sit above the following action plans for which work is underway:

- Workforce representation plan
- BAME action plan
- NPCC action plans and toolkits

The key to achieving the ambitions and success measures set out in this strategy is to ensure that all the action plans and toolkits are smarter, measurable and achievable. All action plans and toolkits will be reviewed by the D&I committee and working group with a view to ensure work is joined-up, lessons learnt are shared and work is not duplicated. We will, therefore, produce one action plan, incorporating existing D&I related plans together with the success measures in this strategy. This will allow us to track our progress delivering this strategy, report that progress in a transparent manner and be held to account by our governing bodies.

The diagram below outlines how the workstreams sit underneath the strategy. The Force has made good progress in establishing working groups and action plans for specific areas of work, and we want the actions identified from the benchmarking exercise to be woven into these existing workstreams:

<b>E&amp;I strategy and vision</b>		
<b>NPCC plan and working group: our organisation</b>	<b>NPCC plan and working group: our communities</b>	<b>NPCC plan and working group: our partners</b>
<b>Workforce representation plan working group</b> <b>BAME action plan working group</b> <b>Annual gender and race pay gap reports and PSED<sup>2</sup> report</b>		
<b>Additional working groups as required</b>		

These working groups sit within the existing oversight mechanisms as detailed in the next section.

<sup>2</sup> Public Sector Equality Duty

## Force oversight and governance groups

**Commissioner** The Commissioner is the Force Lead for Equality and Inclusion and approves the Force Strategy to drive through the organisation maintaining oversight of its implementation.

**Police Authority Board** The Police Authority Board hold Chief Officers accountable for Force performance and will receive updates on the progress of strategy implementation.

**Police Authority Board Lead** The Police Authority Board appoint a Lead Member for Equality & Inclusion who sits on the Force Equality & inclusion Board to retain oversight of this area of work.

**Independent Advisory Scrutiny Group** These are engaged to inform and develop the Force work in Equality and Inclusion providing independent advice and guidance for the Force to consider.

**Equality & Inclusion Board** This board oversees the implementation of the Force Equality & Inclusion Strategy and is chaired by the Assistant Commissioner.

**Equality & Inclusion Operational Board** This board sits under the Equality & Inclusion Board to ensure that all operational and implementation of equality, diversity and inclusion activities are being delivered. The Board is chaired by the Assistant Commissioner's nominated senior lead of at least Chief Supt rank/equivalent Staff Grade.

**Equality & Inclusion Manager** The Force dedicated resource for implementing and embedding EDHR principles within all that we do.

**Diversity Champions** These are appointed within Force to assist in the implementation of our Equality & Inclusion Dashboard.

**Support Networks** Our support networks will be engaged to capture how the work they do will support the implementation of our strategy and inform the development of our measures of success.

- Black Police Association
- Christian Police Association
- Disability Enabling Network

- LGBT Support Network
- Muslim Police Association
- Women's Network
- Health and Wellbeing Network
- The Men's Network

## Appendix:

The following appendices form the context from which this strategy was written. We have included them here for reference.

### National Police Chiefs Council NPCC

National Police Chief's Council (NPCC) brings police forces in the UK together to help policing coordinate operations, reform, improve and provide value for money. Some of the biggest threats to public safety are national and international. The NPCC have a collective strength by coordinating the operational response across forces. The NPCC Diversity, Equality and Inclusion Committee developed a national strategic response and worked with The National Centre for Social Research to provide an evidence base to enable greater workforce diversity and effective service delivery across communities. This strategy gives clarity of leadership and action that is required by the police service across **three categories; our organisation, our communities and our partners**. Embedding diversity, equality and inclusion into all that we do is an essential ingredient for success and fundamental to this is an effective co-ordination committee that influence our work within the NPCC and through into individual organisations.

### Force Equality Duty

As a public sector organisation the Force has a duty set out within the Equality Act 2010 to protect people from discrimination in the workplace and within society in general. We are required to comply with this legislation and in particular section 149 of this Act that sets out the Public Sector Equality Duty. This duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between different people when carrying out their activities.

The Equality Act 2010 sets out 9 protected characteristics that we must consider as part how we work and deliver our services.

Age

Disability

Sex

Gender Reassignment

Marriage & civil Partnership

Pregnancy & Maternity

Race

Religion or Belief

Sexual Orientation

We have a duty to publish information on these characteristics to show compliance with the Equality Act 2010. Data on these will be captured within our NPCC Equality and Inclusion Toolkit and reported for senior managers to monitor and action. Every quarter the Force provide the Professional Standards and Integrity Committee (a sub Committee of the Police Authority Board) with an Equality report which is published on the City of London Corporation's website.

## **National Police Code of Ethics**

There are ten standards of professional behaviour. These standards reflect the expectations that the professional body and the public have of the behaviour of those working in policing. They originate from the Police (Conduct) Regulations 2012 (for police officers) and the Police Staff Council Joint Circular 54 (for police staff). The Code has adapted the wording in the Regulations and Circular 54 so that it applies to everyone. The Code of Ethics, sets out the code of practice for the principles and standards of professional behaviour for the policing profession of England and Wales.

### **1. Honesty and integrity**

I will be honest and act with integrity at all times, and will not compromise or abuse my position.

### **2. Authority, respect and courtesy**

I will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy. I will use my powers and authority lawfully and proportionately, and will respect the rights of all individuals.

### **3. Equality and diversity**

I will act with fairness and impartiality. I will not discriminate unlawfully or unfairly.

#### **4. Use of force**

I will only use force as part of my role and responsibilities, and only to the extent that it is necessary, proportionate and reasonable in all the circumstances.

#### **5. Orders and instructions**

I will, as a police officer, give and carry out lawful orders only, and will abide by Police Regulations. I will give reasonable instructions only, and will follow all reasonable instructions.

#### **6. Duties and responsibilities**

I will be diligent in the exercise of my duties and responsibilities.

#### **7. Confidentiality**

I will treat information with respect, and access or disclose it only in the proper course of my duties.

#### **8. Fitness for work**

I will ensure, when on duty or at work, that I am fit to carry out my responsibilities.

#### **9. Conduct**

I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing.

#### **10. Challenging and reporting improper behaviour**

I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.