

<b>Committee(s):</b> Police Authority Board- For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Quarterly Equality and Inclusion Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 58-19	<b>For Information</b>
<b>Report author:</b> Kam Dhaliwal, Equality and Inclusion Manager	

### Summary

This paper provides your Board with the quarterly update on Equality and Inclusion related activities conducted by the Force since the previous report in April 2019. This report covers activity that has taken place and some information on future plans and actions of the City of London Police. The areas covered by this report are:-

**The Community Scrutiny Recruitment Campaign** -The Force has been focusing on the Community Scrutiny Group recruitment and promoting equality, diversity and inclusion in Force. New Community Scrutiny Group members have been recruited and they attended their induction day in June.

**The BAME Action Plan** –The BAME Action Plan is being led by the Force Race Champion and he is being supported by HR and the staff support networks. A draft was presented to the Performance and resource Management Committee on 21<sup>st</sup> June.

**Work Experience** - The Force is currently delivering work experience to support recruitment, promoting policing and attracting under-represented groups.

**The Independent Advisory Group** – The Superintendent of Uniformed Policing is working with the IAG on the best way to move forward and this is subject to a separate report on the agenda.

**Gender Pay Gap Data** – The force published their Gender Pay Gap Data in line with the legal requirements.

### Recommendation

It is recommended that this report be received and its content noted

## Main Report

### Background

1. The Commissioner undertook to provide members with a quarterly written update on matters relating to the equality, diversity and inclusion portfolio. This report highlights the work that is being carried out across the Force in relation to the above and it provides an update since the last report to the Board.

### Equality and Inclusion Managers Update

2. **CoLP Website:** The Equality Report is due to be published at the end of June 2019.
3. **Royal Navy Diversity & Inclusion Conference:** A number of equality, diversity and inclusivity issues were discussed and information was given about how the armed forces are overcoming such issues. The event was attended by various armed force equality leads and champions.
4. **Zero Suicide Alliance:** The Force's Equality & Inclusion Manager (E&I Manager) attended the event which highlighted some of the areas in public service that needed to be reviewed. There were a number of opposing views on the language used to address suicide and the cultural impacts of suicide. Zero Suicide Alliance has a free 20 minute suicide prevention video that can be accessed on-line, 24 hours a day. The link has been shared with Learning & Development to assess if the video could be incorporated into Force training packages or link shared on the Force website.
5. **Cheshire Police Positive Action ET Case:** This case was brought against the force by a male (the claimant) who did not have any protected characteristics and was not successful in his application to be recruited as a Police Officer. It has received significant media coverage. The Employment Tribunal (ET) found in favour of the claimant, in that he had been discriminated against. The ET scrutinised the forces recruitment processes and markings. The ET found that the force had failed to mark all candidates consistently. The ET found

*138. The application of this selection procedure at the time was in the Tribunal's view premature without a full analysis of the impact of the measures that were already in place. Further there appeared at times a scattergun approach to the individuals with different protected characteristics. The Tribunal considers that the manner of the selection imposed what the Government Equalities Office had counselled against in that it was an artificially low threshold, imposing an artificially low threshold would not be a proportionate response to recruiting to address the issue of a lack of diversity balance.*

*139. In the circumstances the respondents have not demonstrated the justification for the discriminatory effect of the positive action they applied in this case. The respondents were required to consider first the bedding down of their previous positive action measures, secondly, to measurably assess the impact of those to potentially apply positive action to a smaller exercise in the first place, and to not impose artificially low thresholds in terms of a recruitment procedure, nor to completely ignore a qualitative assessment of candidates and then to re- introduce a merit based analysis in a later part of the recruitment.*

*140. In the circumstances the Tribunal concludes that the claimant would have succeeded in his application and been appointed as a Police Constable, had the respondent, not applied positive action at the interview stage having obtained and ignored qualitative data and where he was a relatively strong candidate and likely on our assessment to have been positioned on the right side of the number needed to fill the vacancies.*

*141. In the circumstances the claimant's claim in respect of direct discrimination succeeds'.*

6. The learning from this ET will be taken forward by HR via the Force's Organisational Learning Forum.

### **Community Scrutiny Group Recruitment Campaign**

7. The Force has established a new Community Scrutiny Group (CSG) with new members. The group is formed of 12 members (subject to successful vetting) who are reflective of the greater London population. All members were invited to attend an induction day on Tuesday 11<sup>th</sup> June. The induction meeting provided the CSG members with an understanding of police community scrutiny groups, training, Terms of Reference, Stop & Search, Use of Force, Spit Guards and Limb Restraints and police feedback. The CSG will now receive some high level training on policing matters to enable them to provide the force with constructive feedback. There is a separate report on your agenda referencing plans moving forward with the CSG and Independent Advisory Group (IAG).

### **BAME Action Plan**

8. At the last Equality & Inclusion Board the Forces Race Champion (who is of Chief Inspector rank), was given ownership for drafting a new BAME Action Plan for the Force. It was agreed, that the Head of Human Resources (HR) and the Organisational Development Manager would be contributing and consulted on this plan and that HR would be the strategic lead. A draft Plan has been developed and it is in the process of being circulated to relevant stakeholders for wider consultation, including the Staff Support Networks. Early feedback on the plan has already been received from key staff internally, including better identification of actual deliverables and outcomes. The Draft Plan was presented to your Police Performance and Resource Management Committee for information on 21<sup>st</sup> June 2019.

9. The Chief Inspector will continue to work closely with colleagues from HR and Organisational Development to develop and finalise the plan. The plan has been drafted and based on the National Police Chiefs' Council (NPCC) Workforce Representation, Attraction, Recruitment, Progression and Retention Toolkit 2018-25. With the additional working strand of 'development'. The draft plan was presented at the Force's Equality & Inclusion Board Meeting in June.

### **Work Experience**

10. It was agreed at the May 2018 Equality & Inclusion Board that the Force would reintroduce Work Experience. Work Experience is currently being managed and temporarily owned by the Equality & Inclusion Manager due to resourcing pressures in HR Services.
11. There have been 39 requests from students and others to conduct work experience in the Force. The students are from various backgrounds and some with protected characteristics. There are students scheduled to complete work experience over the following periods: Monday 1<sup>st</sup> July until Friday 5<sup>th</sup> July, Monday 8<sup>th</sup> July until Friday 12<sup>th</sup> July and Monday 15<sup>th</sup> July until Friday 19<sup>th</sup> July. The hours of attendance are 9am to 3pm. Students have to pass vetting to complete work experience with the Force. Work experience provides students with awareness of police activities. Sessions cover Fraud/ Economic Crime, Dogs and Mounted Unit, Scientific Support/ Forensics, visit to the Old Bailey, Counter Terrorism, Confidence building, CV writing, Cyber Crime and other police functions. Students are shown all the opportunities available in policing. The students are grouped together to facilitate management of the group which mitigates the impact on the Force's business as usual activities.
12. The Force is providing work placements in the IT Department for two BAME students from Westminster Kingsway College. Once completed, the work placements provide the students with credits which contribute to their Level 3 BTEC Computing.

### **Independent Advisory Group Update**

13. The Independent Advisory Group has recruited two new members in the last reporting period and received a number of presentations including an input on Transform. Superintendent Response and Operations has been co-ordinating and working with the current Chair to assess future arrangements, with on-going consultation with members of the group regarding the future of community scrutiny and advisory groups. This is subject of a separate report on your agenda.

### **Gender Pay Gap Data**

14. On the 30<sup>th</sup> March 2019, the Force published its Gender Pay Gap data. The data published on the Forces website is data for Police Officers only. Police civilians are employed by the City of London Corporation (CoL) and their data has been included in the CoLs results, in line with the regulations. The Forces

Police Officer results are below and the results for the CoL can be found using the following links.

- [UK Gov.UK Gender Pay Gap Reporting](#)
- [The City of London Corporation Gender Pay Gap report](#)

Police Gender pay gap			
Pay rates	Gender pay gap - the difference between women's pay and men's pay as a percentage of men's pay		
Mean hourly rate	2.6%		
Median hourly rate	0.4%		
Pay quartiles	Women	Men	Total
Proportion of women and men in the <b>upper quartile</b> (paid above the 75th percentile point)	19%	81%	100%
Proportion of women and men in the <b>upper middle quartile</b> (paid above the median and at or below the 75th percentile point)	23%	77%	100%
Proportion of women and men in the <b>lower middle quartile</b> (paid above the 25th percentile point and at or below the median)	16%	84%	100%
Proportion of women and men in the <b>lower quartile</b> (paid below the 25th percentile point)	37%	63%	100%
Bonus pay	Bonus Gender Pay Gap - the difference women's bonus and men's bonus as a % of men's bonus		
Mean bonus	23%		
Median bonus	0%		
Bonuses paid	Women	Men	
Who received bonus pay	1%	2%	

## Narrative analysis

15. Police Officers' pay is determined in accordance with rank, with no reference to gender. Female and male officers who undertake the same role, have the same length of service and work the same hours receive the same pay. Their terms and conditions are set nationally by the government based on recommendations from the independent Police Remuneration Review Body (PRRB) and are bound by police regulations.
16. At the City of London Police, 77% of officers are male and 23% are female, meaning every 1 in 4 Police Officers is female. Factors such as sickness, part-time working, maternity pay, paternity pay, over-time payments, length of service and unsocial hours payment will impact on an individual's pay. Length of service also influences base pay rates in respect of the position on pay scales.

## Hourly wages pay gap

17. In the Force, **women earn £1** for every **£1** that men earn when comparing median hourly wages. Their median hourly wage is **0.4% lower** than men's. When comparing mean hourly wages, women's mean hourly wage is **2.6% lower** than men's.

## Proportion of women in each pay quarter

18. In the Force, women occupy **19%** of the highest paid jobs and **37%** of the lowest paid jobs.

## Bonus pay gap

19. In the Force, **women earn £1** for every **£1** that men earn when comparing median bonus pay. Their median bonus pay is **0% lower** than men's. When comparing mean bonus pay, women's mean bonus pay is **23% lower** than men's.

## Conclusion

20. The Force continues to work on Equality and Inclusion issues, with oversight through the E&I Board chaired by the Assistant Commissioner. Acting on the feedback from the external benchmarking exercises assists the Force to incorporate best practice into its processes. Regular reporting to your Board ensures that Members are informed and this area of business is subject to oversight and scrutiny.

### Contact:

*Kam Dhaliwal*

*Equality & Inclusion Manager*

*Phone 0207 164 8212 Mobile 07803 305 430*

*Email [kamalpreet.dhaliwal@cityoflondon.pnn.police.uk](mailto:kamalpreet.dhaliwal@cityoflondon.pnn.police.uk)*