

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 9 th May 2023 24 th May 2023
Subject: Quarterly Equality and Inclusion Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 and 3
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police Pol 58-23	For Information
Report author: Detective Superintendent Kate MacLeod, T/Chief Superintendent Sanjay Andersen, Head of Professionalism and Trust	

Summary

This report provides an update regarding Equality & Inclusion(E&I) activity within the Force from a national and local perspective since the last report to your Committee in February 2023. Appendix A provides a number of slides to outline our delivery of the current E&I Strategy. Appendix B gives a detailed update on the Police Race Action Plan and CoLP activity.

The report also includes highlights of activity regarding the E&I workstreams.

The CoLP is currently reviewing reporting across all areas of E&I, with a view to streamlining our regular updates to Committees and consolidating these where possible as there are many areas where the work cross cuts with other existing workstreams.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

a. The Delivery Plan provided in Appendix A represents a consolidated Plan for all outstanding deliverables across the below plans:

- National Police Chiefs Council (NPCC) Equality & Inclusion (E&I) Plan;
- Police Authority Board (PAB) recommendations;
- Tackling Racism Taskforce (TRTF) recommendations;
- Black and Minority Ethnic Action Plan, and
- Lesbian, Gay, Bi-sexual and Transgender + (LGBT+) Action Plan.

The Plan is arranged in cross cutting workstreams and is regularly updated for internal and external review and scrutiny, most recently discussed at the E&I Strategic Board which took place on 28th April 2023.

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Current Position

b. **National updates:**

A progress update on the National Police Race Action Plan (PRAP) was presented to Chief Constable's Council on 29th March 2023, including feedback from Abimbola Johnson, Chair of the Police Independent Scrutiny & Oversight Board (ISOB)¹. As a result of this discussion, a decision has been made to postpone release of the next iteration of the plan to ensure that:-

- Stakeholder feedback on the plan has been thoroughly examined, considered, and stakeholders updated prior to any publication;
- The findings of the Casey Review can be considered and linked to the Plan;
- The Plan includes commentary, examples and case studies from key stakeholders, including ISOB, and contributing forces.

The National Police Chiefs Council (NPCC) and College of Policing have also recently highlighted progress made since the plans launched in May 2022, key areas of work as follows:-

- Detailed proposals for a National Data Transparency Strategy for the police service. The strategy aims to drive transparency, accountability and integrity in policing, by ensuring that police data is clear and accessible, 'open by

¹ [About the Chair | ISOB \(policeisob.co.uk\)](https://www.policeisob.co.uk/about-the-chair)

default' and 'usable to all'. Proposals were submitted to the Chief Constables' Council (CCC) in January 2023 for approval.

- Development of an annual ethnicity pay gap report for policing. This work is underway. The results of icebreaker force activity and a timeline for national adoption will be submitted the CCC in April 2023 for approval.
- Introduction of a single definition of 'disproportionality'. Work is underway on this definition for use by forces to ensure more consistent, effective and transparent assessment of policing activities across England and Wales.
- Design of specific activities in response to the results of the inaugural 'Our Black Workforce' survey, published in December 2022, to build on the positive experiences of Black officers and staff, and to address their challenging experiences.
- Introduction of revised NPCC guidance on body-worn video cameras in 2022, which set out criteria for their consistent use.
- Changes to the curriculum for initial entry routes into policing, to ensure that new officers have a greater understanding of the experiences of Black communities and their relationships with policing. Role-specific reviews for serving officers and staff are ongoing.
- Evaluation of new police and public safety training to help police officers manage conflict situations effectively, safely and – where appropriate – without using force. Service-wide implementation of the training begins from April 2023.
- Piloting the recording of vehicle traffic stops, which is not a requirement under current legislation. This action shows the determination to challenge established practices, identify and address disparities, and – if required – build a case for reform. An update on the pilot, with a recommended route for national implementation, will be presented to the Chief Constables Council.
- Development of a National Mentoring Scheme, a pilot programme that will start soon, which will see Black professionals and executives providing peer support and mentoring to chief officers in policing.

c. Local updates:

CoLP Response to Recent Reports

The independent review into the standards of behaviour and internal culture of the Metropolitan Police Service was published on 22nd March 2023, generating widespread media coverage and significant debate. It was felt important that we had internal conversations on the key findings; hence the Commissioner calling an extraordinary meeting for all Senior Leaders on the day after publication to gain initial impressions and ideas; something which has been encouraged throughout the organisation. The Commissioner and Assistant Commissioner have also met with our staff network leads to discuss the report and will be focusing on the learning in the Senior Leadership Forum in June.

Our Professionalism & Trust team and Strategic Development are now in the process of leading our response to this final review. We have already completed an assessment (following the initial Casey report and other high-profile reviews in this

area such as Op Hotton²). We have now assessed the recommendations in this final Casey report which we have mapped to existing activity and any gaps identified. A more detailed report regarding the Baroness Casey Review was reported the Police Authority Board on the 2nd May 2023 and is also included on this agenda.

Police Race Action Plan

The force's Professionalism & Trust Team have captured recommendations from a number of areas (Government, Policing and Internal Culture) to create our own Localised Race Action Plan. This is currently being reviewed by our staff networks, with a number of actions identified across 4 key areas:-

- Internal Culture
- Use of force
- Communities and Relations
- Protection from Victimisation

We will be publishing our plans later this Summer once action owners and KPIs have been agreed.

Members will note a separate detailed update for Race is included in this pack at Appendix B and provides a summary of the force's work in this area over the previous 6 months, including:-

- Focus on events & Black History Month
- Our Inclusivity Programme
- Sponsorship Programme
- Positive Action Leadership Scheme
- Support for Promotion

Violence Against Women and Girls

Members will note that a separate detailed report for Violence against women and girls is included on the Committee agenda and references the following:-

- Listening Circles
- White Ribbon Accreditation
- HeforShe Relaunch
- DA Matters Training
- Walk and Talk Initiative
- Op Reframe

Public Sector Equality Duty (PSED) Report:

The Public Sector Equality Duty Report was published at the end of March 2023, it contains the force's workforce data which relates to the 9 protected characteristics

² [Operation Hotton Learning report - January 2022.pdf \(policeconduct.gov.uk\)](#)

represented in the Equality Act. Members are asked to please note progress highlights against our two equality objectives, set in 2020:-

Objective 1: Increase the number of Black and Minority Ethnic and female officers to be reflective of the London population.

- There has been a slight increase in the force's diversity representation, from 185 Black and Minority Ethnic staff and officers (or 13.6% of the workforce) in 2021 to 206 Black and Minority Ethnic staff and officers (or 13.9% of the workforce) in 2022.
- There has been an increase in the number of females being promoted in previous years, from 9 officers and 13 staff in 2021 to 11 officers and 30 staff in 2022.
- The acting/temporary promotion opportunities for our female offices and staff have increase over the reporting period.

Objective 2: Increase the number of officers and staff self-declaring their protective characteristics.

The table below shows disclosure rates for 2022, these are not significantly different to 2021 data- there is a slight increase in sexual orientation disclosure rates but a decrease for disability.

Characteristic at 31 December 2022	Disclosure rate (%)
Age	100
Disability	20
Ethnicity	98
Gender	100
Religion or Belief	54
Sexual Orientation	54
Transgender	29

Human Resources has reviewed the PSED report for 2022, the Force will continue to work on the objectives with the aim of making further progress. Our recent uplift programme has witnessed tangible gains in terms of gender parity and diversity, the Force recognises that this work must continue.

Gender Pay Gap 2022

The City of London Police's Gender Pay Gap Data (GPGD) results only relate to police officers, results for our police staff colleagues are contained within the Corporation results.

The Gender Pay Gap, considers any contractual element relevant to pay (pay scale & rank) and includes basic pay, London Weighting / Allowance, Housing Allowance / Rent, Thresholds, and Specialist Allowances i.e. Dog Handlers. As of 31 March 2022, the overall Gender Pay Gap for City of London Police was:

Mean Hourly Rate	Median Hourly Rate
-1.5%	0%

Meaning that for every £1 a male officer earns, a female officers earns £1.02, representing a 2p variance in favour of women. There is no gender pay gap when examining the data at a median hourly rate.

Although our force performs well in relation to our general gender pay gap, this looks slightly different for our distribution of bonus payments. Out of 842 officers, bonus payments were given to 123 (15%) police officers, of which 109 (89%) were male and 14 (11%) female. As such, 17.1% of all male police officers received a bonus compared to 6.9% of all female police officers. However, as bonuses can be role specific in policing this may have had an impact on this outcome for example in Firearms, where the Force is running a campaign to attract more female members.

In understanding these figures better, the force is committed to better capturing equality data going forwards, including data on training (including student officers), course allocation, allocation of projects, mentoring opportunities and exiting the force.

A number of initiatives are underway in this area, including:-

- 'Leading with Impact', a course targeted at self-developing female officers and staff who aspire to become managers from PC to Sergeant and Sergeant to Inspector.
- 'Positive Action Leadership Scheme' (PALs) and Sponsorship programme which are both aimed at developing our Black, Asian and other Ethnic Minority officers and staff (more detail can be found in the Race Plan overview document).
- Plans under recruitment i.e. a committed equal opportunities employer with adverts actively encouraging applications from under-represented groups and being readily available / accessible to such groups in the first instance.
- Ensuring that pay is standardised across entry pathways, promotion equality of opportunity.
- Exploring options for student officers to apply for flexible working patterns to encourage women to join the police who have caring commitments.
- Targeted recruitment and selection of under-represented groups to specific roles e.g. Firearms

d. Highlights of the E&I strand work completed since the previous update include:

1. Recruitment and Onboarding

In addition to the points discussed above relating to the Public Sector Equality Duty report, HR are also currently working with Organisational Development Practitioners to review our Promotion Processes for officers. Working groups have taken place

across the force and we are now working with this feedback to create our new frameworks.

The aspirational workforce targets that were set in 2022 have been reviewed to ensure that CoLP are moving in the right direction, particularly with Black and Minority Ethnic and female candidates. Following the student officer processes, which included a direct entry detective route and Police Now, we have seen a significant increase in applicants who identify as Black and Minority Ethnic and female. We are working to ensure this trend continues.

2. Health & Wellbeing

There has recently been a change in ownership for this strand, with our new Lead engaging with members of the workforce to create a new working group. This group will include key business leads and specialist advisors to help with the delivery of core objectives. Due to the changes in leadership there is little to report in addition to the previous update, a reminder of some of this activity:-

- April 2023 saw the launch of a new partnership with Alcoholics Anonymous to help provide support and guidance for our detainees, recent research shows that 49% of detainees in Custody report addiction issues.
- Completion of 'Better listening' campaign training in collaboration with the Samaritans charity.
- Embedding of Mental Health first aiders (20 officers)
- Continuation of Collaboration with Police Mutual with the cost of living crises, including 'focus on' talks and pop up stands for 'in person' advice and support.
- Refresh of Occupational Health (OH) communication package, created as a quarterly force wide update to highlight the good work within the OH team and sign-post colleagues to their services.
- Refresh of the Wellbeing strategic document (2023 version).
- Completion of the PEEL HMI CFRS inspection where good feedback was received from the focus groups / reality testing feedback within the PEEL process.

3. Community Engagement

- Stephen Lawrence day 29/4/23 – over 100 young people invited to discuss legacy, with a number of speakers & opportunity for student officers to engage with young people re critical topics such as stop & search & will contribute towards Race action plan.

- Amazon Schools Project successfully ran in September 2022 bringing together 50 16-24 year olds – next event will be 20th June 2023 – focus on young people and stop and search.
- Volunteer Police Cadets (VPC) continues to impact across the City Police Area. The Unit is now 34 strong, with applications consistently being received. There remains good gender parity and diverse representation (15 male and 20 females; 17 cadets have self-identified as from an ethnic minority background). In addition, the City of London Prep school (a joint venture between City of London Girls School and City of London Boys School) have expressed willing to host a Junior Cadet Unit which is being progressed to start.
- Youth IAG is progressing, SOP has been drafted + benchmarking taking place. Partnership and Prevention (P&P) hub is now actively recruiting young people to join via City of London academies.
- Partnership led community high vis days have continued (last one 20/4/23 Op Rocotto- with Security Industry across City).
- The Strategic Research & Analysis Unit have produced a CoLP Community Profile –pulling together data from various sources to provide a picture of the various groups within the City of London and map its diverse communities. This profile will be continually updated with the Census results later this year. This along with our calendar of events and meetings will be published on the internet. Update: Updated profile requested via Strategic Research & Analysis Unit (incorporating latest Census data) – once complete, will be shared for awareness.
- Cluster panels continue across the City quarterly with a number of local promises / priorities being set
- Op Reframe for Night time Economy continues.
- Life Skills programme in City Schools launched in Aldgate School (3 schools this year 1 2024). Neighbourhood officers will be trained to deliver the training package in Schools, affording valuable time for youth engagement and early intervention.
- Partnership & prevention hub being fully staffed to concentrate on key thematic areas such as mental health, using uplift Dedicated Ward Officers (DWO) .
- During probationary period our new officers complete:- business engagement session, working with cadets, school engagement and attendance at cluster meetings. Projects and work will be linked to these activities following evidenced based policing criteria. Our People Inclusivity Strategy includes a PDR objective linked to a community module. An opportunity for staff to identify an initiative linked to diversity, inclusion, values in their own local community. Colleagues will then engage in person for half a day in that project & complete reflective practice in the form of a blog, journal or PDR entry
- IASG scrutiny of stop search forms and Body Worn Video (BWV) continues to develop. Working with East London University to utilise students to further enhance stop and search scrutiny, being progressed.

Key next steps to be made:

- Support the formation of Business Improvement Districts Sounding Boards (akin to a business IAG) to sense check operations/initiatives in Force.
- Following Neighbourhood Policing Peer Review (Surrey Police) there is an opportunity to utilise partner data sets quickly via 'Acorn' to map communities better – P&P Hub to research.
- Recruitment for Special Constabulary now live, aim to recruit further officers into the new model in 23-24.
- Neighbourhood Policing improvement board started at the end of April and will focus on the 7 neighbourhood principles & response to Peel recommendations.
- Refreshed ASB steering group being held in June under safer city partnership looking at partnership response to ASB.

4. Leadership & Culture

- An update on the Force's Inclusivity Programme is included in the attached Race Action Plan update. 3 further online launch sessions are planned for May and the programme is being featured in the next College of Policing digital magazine highlighting good work in this area.
- The CoLP has rolled out Active Bystander Training in April 2023, with Chief inspectors and police staff equivalents and above (Grade F and above) encouraged to sign up to one of four, 2-hour sessions taking place in April and May. This will help to ensure that our Senior Leadership Team fully understand their role as leaders in tackling such behaviour and supporting their staff to do the same. It's intended that all colleagues take part in this training later in the year following the next step 'train the trainer' in force. Senior Leaders from the Corporation and our IASG (Independent Advisory Scrutiny Board) have been invited to these sessions.
- CoLP's Data Bias Working Group concluded its year-long review of this subject area. Proposals will be brought to the July Equalities & Inclusion Strategic Board for consideration and approval.
- The results of CoLP's annual workforce survey have been shared with staff. Unit / team heads have now produced local action plans, to address areas of improvement.

Key Next Steps

- Monitor participation in the forthcoming series of Our People – Inclusivity events.
- Monitor participation and collate feedback from our Active bystander training, to inform how we roll this out to the remainder of the force.
- Ensure that a programme of follow-on inclusivity events is published on City Net and that supervisors include mandatory participation in 2023/24 PDR objectives.
- Formalise data bias work within the existing force governance structure - including the integration of the NPCC's Data Literacy Framework (decision paper to be submitted to E&I Strategic Board).

- Review annual staff survey results (leadership & culture related responses) - and ensure that areas for improvement are reflected in unit / team action plans.
- Finalise the plan for Forces annual Equalities & Inclusion award.

5. Retention and Exiting the organisation

Earlier this year, the Strand Lead organised a workshop for all employees to discuss the revised draft mapping process, using the four key areas. These have been embedded into a revised exit mapping process that captures the learning and feedback from previous working groups, the key areas are:

- Work Strand 1 – The identification and recording of data use.
- Work Strand 2 – A review and agreement of the Exit Interview process.
- Work Strand 3 – Exit interview questions.
- Work strand 4 – Retention conversations.

Next steps are for the new EDI Strand working group, which is made up of key specialist advisors and departments, to implement and embed the recommended changes. The working group will continue to consult with key stakeholders, staff support representatives and force employees.

Conclusion

The Force Continues to progress the work strands under Equality and Inclusion as a priority.

Appendices

- Appendix A – EDI strand lead updates
- Appendix B – Police Race Action Plan – CoLP 6 month overview

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