

# Equity, Diversity & Inclusion Strategy

2024-2027

*Photographic placeholder*

CITY OF LONDON  
**POLICE**



***"Our aim is for the City of London Police to become the most inclusive and community orientated police service in the country"***

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## **COMMISSIONER FOREWORD**

I am delighted to introduce our new Equity, Diversity and Inclusion Strategy (2024-2027) which is at the heart of our journey to create an environment where our employees feel valued and included. The strategy underpins the values within our [Policing Plan](#) and outlines how we will continue to provide a professional and compassionate service to all of our communities.

The foundation of effective policing lies in trust, confidence, and legitimacy. To truly uphold policing by consent, we must embrace diversity in all its forms. This means treating all our communities fairly and welcoming individuals into our organisation from various backgrounds. This range of unique perspectives drives sound decision-making and represents the rich tapestry of our communities. We know that by fostering an inclusive environment where everyone feels a genuine sense of belonging and knows that their voices are heard, we unlock the full potential of our organisation and deliver better services to our communities.

In developing our approach, we have involved our employee networks and associations, internal workstream leads, diversity champions, and key partners. Their insights and experiences have enriched this strategy, ensuring it is comprehensive and relevant to the realities we face.

While we have made significant strides since the publication of our last strategy, it is a long-term journey that requires unwavering focus. We are committed to building upon our past achievements and setting ambitious equality objectives. Our goal is not only to meet legal requirements but to exceed them, actively promoting equality across the delivery of all our services.

As we embark on this journey, we remain accountable to our communities. By fostering an inclusive culture that encourages open dialogue, we will cultivate a deeper understanding of the challenges faced by different communities and deliver a police service that meets unique needs.

I am excited about the positive impact this strategy will have on our organisation, the communities we serve, and the broader landscape of policing. Together, we will continue to work to become a police service which is the most inclusive and community orientated in the country.

**20**

**ED&I Strategy Plan on a Page**

**24**

**Our aim is for City of London Police to be the most inclusive and community orientated police service in the country**

**Priorities:**

**Tangible outcomes Year 1:**

**What this will deliver:**

**\*\*\*N.B. This is a placeholder and will populated once Strategy content agreed\*\*\***

**CITY OF LONDON  
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## SECTION 01:

# WHAT EQUITY, DIVERSITY AND INCLUSION MEANS TO US

**The City of London Police is committed to promoting diversity and fostering an inclusive environment. Our focus lies in ensuring that all employees are valued and respected, thereby enhancing our ability to provide a professional police service across our diverse communities.**

We embrace and support under-represented groups and encourage a workplace where everyone can be their authentic selves, regardless of race, age, gender identity, beliefs, abilities, or who they choose to love. Employee networks and groups play a vital role in promoting achievements and organisational values. Our focus remains on continuous improvement to foster a strong sense of belonging and pride in our collective accomplishments across our equity, diversity and inclusion workstreams.

Having Equity, Diversity and Inclusion front and centre in all that we do and reflecting the communities we serve, helps to enhance public trust and confidence. This leads to greater community engagement, improved problem solving and an increased ability to provide a professional and compassionate service to all of our communities.

### **Why have we replaced Equality to have a new Equity, Diversity and Inclusion Strategy?**

**Equity** refers to fair treatment for all people, it differs from equality in a subtle and important way which is why we have moved towards this. While equality assumes that all people should be treated the same, equity takes into consideration a person's individual circumstances, adjusting treatment accordingly so that the end result can bring about equality.

Every individual has unique characteristics. When we talk about **diversity**, we refer to how these characteristics differentiate people from one another and from different groups. This is not just about physical diversity but also diversity of thought and the benefits which are brought to decision-making by having a range of perspectives.

**Inclusion**, also referred to as inclusiveness, is a concept that refers to the practice of providing equal access, opportunity, and consideration to all individuals, regardless of race, ethnicity, gender identity, age, sexual orientation, socioeconomic status, disability, religion – or any other characteristic that might lead to discrimination or marginalisation.

Our inclusivity commitment is to continue to create an environment where all our employees feel valued, respected, and empowered to participate fully, contributing to their full potential and able to be their authentic selves. This includes ensuring that diverse perspectives, backgrounds and experiences are taken into account and represented in decision-making processes, policies and practices. This commitment extends to all of the communities we serve, ensuring that our

inclusive policing approach builds trust and confidence and is supported by our policing plan priority to keep those who live, work, and visit the City safe and feeling safe.

**Our new Equity, Diversity and Inclusion Strategy is not just about tolerance or acceptance; we go beyond that to actively embrace and celebrate the diversity of our people and the communities we serve.**

## SECTION 02:

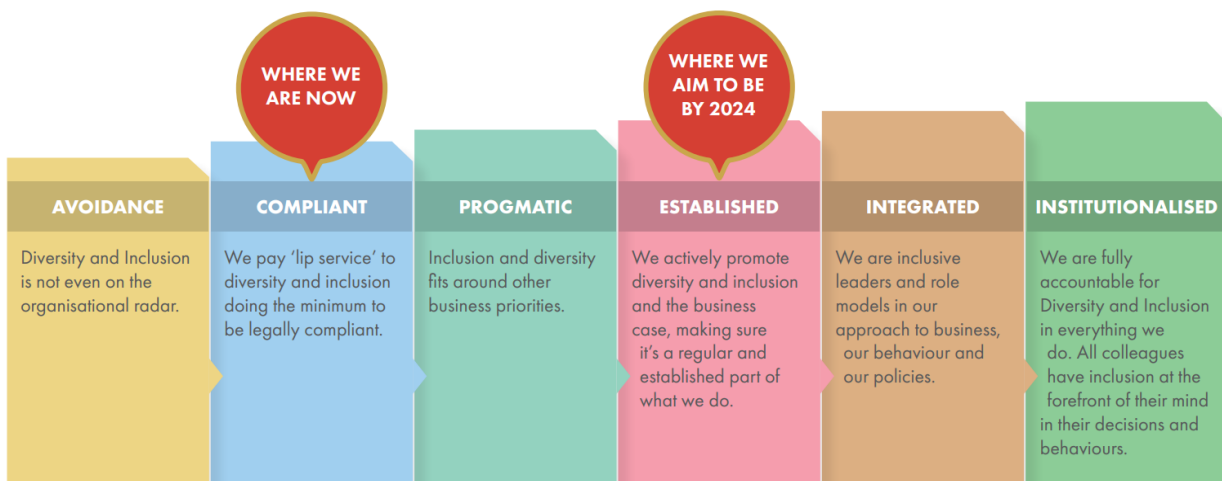
# WHERE WE ARE NOW – OUR EQUITY, DIVERSITY AND INCLUSION JOURNEY

Since the publication of our last Equality and Inclusion Strategy in 2020, the landscape of policing has changed dramatically. Sadly, there have been many instances across policing nationally where disrespect, abuse, misogyny, racism, homophobia and exploitation of police powers have shone a spotlight on the necessity to transform police culture. We see this Strategy as an opportunity to change the picture, we have brilliant people working for us who do brilliant things every single day. We want the public to see this and also all of the work we are doing to excel in our EDI commitments. This is why we will be ambitious in leading the way by ensuring that our organisation is trusted by our employees and the communities we serve, and that our workforce demonstrates the highest examples of our values of professionalism, integrity and compassion in all that we do.

At the heart of our policing model is legitimacy, and we can only maintain this through the support, trust and cooperation of our communities. Disappointingly, despite the significant work we have undertaken to improve our representation of the communities we serve within our workforce, we still lack officer representation of ethnic minority groups and women at all levels. Improving our representation and the experience of policing by our diverse communities will remain a top priority. Equally, we will prioritise our work to become an organisation which is demonstrably anti-racist and proactive in tackling discrimination. To understand our progress on this journey we will use our most recent 2020 Inclusive Employers benchmark and ensure that this is refreshed in 2024.

Our 2020 benchmark placed us at the 'Compliant' stage within the Inclusion Maturity Model. We were extremely disappointed with this and over the past 3 years have dedicated efforts across all areas of the organisation to provide rapid and tangible progress in this area. We have an extensive commitment to get this right with an aim for 2024 to be graded as at least 'Established'. We will review our progress with candour and ensure a clear focus on developing an inclusive, high performing workforce to deliver an excellent policing service.

## Inclusion Maturity Model



Since 2020, we have also published our new [Policing Plan](#) which marks a fresh start for the City of London Police during what remains a difficult time for policing. The Policing Plan is focused on rebuilding trust, putting victims first, and creating an inclusive and supportive culture. It aims to attract diverse talent, prioritise well-being, and develop strong leadership capabilities.

Our new Equity, Diversity, and Inclusion (EDI) strategy encourages culturally competent policing and reduces biases, leading to more effective crime prevention and resolution. Moreover, it addresses how we can overcome disproportionate impacts, such as how we apply our use of force powers, cultivate inclusive leadership, and foster an environment that values diversity.

This strategy also sets out in greater detail how we will support all of our communities. We know that communities are not homogenous, they are composed of individuals from various backgrounds, cultures, races, religions, genders, and more. An inclusive police service reflects the diversity of the communities it serves, allowing officers to better understand and connect with the people they protect. When community members see officers who resemble them or share similar experiences, trust and cooperation are more likely to be established.

Our culture has continued to mature by embracing the wider range of perspectives and ideas which our people, public and partners offer. Different backgrounds and life experiences bring unique problem-solving approaches and creative solutions, our approaches to neighbourhood and evidence-based policing are just some of the ways we welcome diverse viewpoints to solve complex challenges in more comprehensive and innovative ways.

We have continued to invest in improving upon the cultural competence of our workforce. Our employees are now trained in cultural awareness and sensitivity through bespoke Inclusivity programmes, making them better equipped to navigate cross-cultural interactions and understand the nuances of diverse communities. This understanding reduces the likelihood of unintentional biases and misunderstandings, promoting fair and respectful treatment for everyone and creating a police service we can be proud of.



# KEY ACHIEVEMENTS SINCE OUR LAST STRATEGY

## Establishment of Professionalism and Trust directorate:

To address challenges in policing, a directorate focusing on professionalism and trust was created. It manages strategies for violence against women and girls, racism in policing, and other areas, including Equity, Diversity, and Inclusion.

## Mentivity:

Training to gain insight into young Black people's experiences of interacting with the police.

## Listening Circles:

Safe spaces for women to share experiences, recognized as good practice by the HeForShe movement.

## Disability Enabling Network and DANI working group:

Addresses neurodiversity inclusivity with various stakeholders, prioritizing areas like workplace adjustments and recruitment.

## ADHD screening in custody national pilot:

Fast-track ADHD diagnoses for detainees to improve case outcomes and mental health support.

## Superintendent's Association:

Sponsorship and support for underrepresented individuals to develop into leaders, resulting in increased female representation.

## Active Bystander training:

Being rolled out to leaders to tackle inappropriate behaviour and support staff well-being.

## Dyslexia Assessment Team (DAT) launched:

Supports colleagues with dyslexia to reach their potential by providing assessments and reasonable adjustments.

## SignVideo app:

Makes the City of London Police accessible to Deaf BSL users, offering communication services via video calls.

## BSL trained officers:

Eight officers are Level 1 BSL trained, and Police Liaison Officers for Deaf people are being established.

## Events to tackle under-representation in policing:

Organized by the Network of Women, including open-days with British Transport Police to showcase roles and demystify training requirements.

## Operation Reframe:

Partnership approach to keeping people safe in the City at night, which includes working with licensed premises, security staff and promoting the 'Ask for Angela' campaign.

## Youth Independent Advice & Scrutiny Group (YIASG)

Introducing a YIASG to afford further external, independent scrutiny of policing provisions and services, but through the lens of a young person.

# SECTION 03:

## OUR PRIORITIES

Over the next 3 years of this Equity, Diversity and Inclusion Strategy, we will deliver on the following priorities:

Our People	We have a workforce that reflects the communities we police and an environment which creates a sense of belonging.
Our Public	Equity and inclusion is central to how we deliver our service (local and national communities) and the public trust us to act fairly and with integrity.
Our Processes and Policies	Our policies, processes and procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies.
Our Partners	We influence equity and inclusion through our network and supply chain

## SECTION 04:

**OUR PEOPLE:** *We have a workforce that reflects the communities we police and an environment which creates a sense of belonging.*

We will achieve this by:

- a) recruitment activity that improves how well our workforce reflects the communities we serve, including a career pathway from police cadet to police officer or police staff.
- b) positive action schemes that support officers and staff from under-represented groups to develop laterally and through promotion
- c) leaders championing and being accountable for equity, diversity and inclusion
- d) fostering an inclusive culture where our people feel a sense of belonging
- e) promoting behaviours and conduct in line with the Policing Code of Ethics, dealing swiftly with discrimination, micro-aggressions and behaviour falling below this standard

### **Recruitment activity that improves how well our workforce reflects the communities we serve:**

Our current workforce profile shows that disappointingly, we still have much more work to do to become fully representative of our communities.

#### **Population**

**8,600**

people

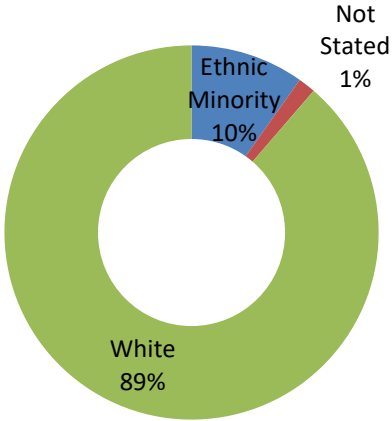
**56,490,000** people in England

Rounded to the nearest 100 people

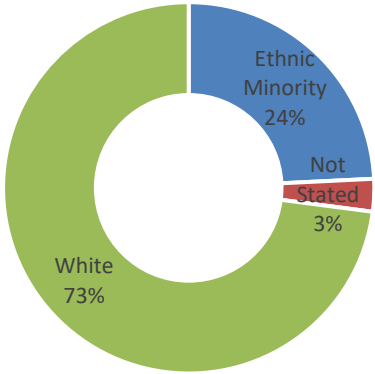
Data based on the 2021 Census shows that the City has a residential population of 8,600. However, the public we serve are beyond the square mile and span nationally and internationally through our National Lead Force areas for Cyber and Fraud. Indeed it is estimated that in 2021 there were 587,000 workers who commuted into the City of London.

Although we are working to improve representation across all protected characteristics, we know that greater representation for all minority ethnic groups and women in policing is critical to improving trust and confidence across our communities. Our current profiles are outline below:

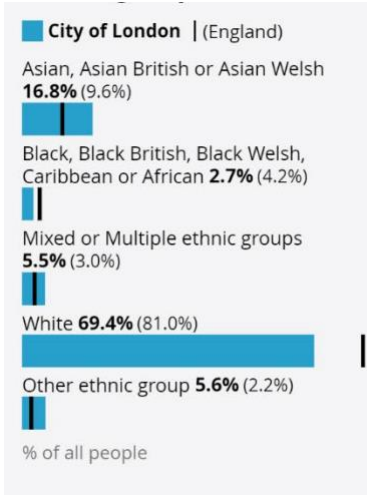
**Officer Ethnicity Profile (%)**



**Staff Ethnicity Profile (%)**



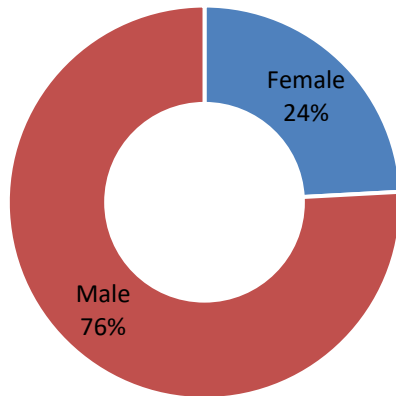
**Ethnicity (residential):**



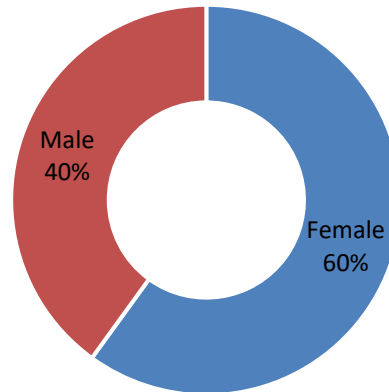
As of 2022, 37% of the **commuter workforce** was black, Asian or identified from another minority ethnic group, with the remainder identifying from a white ethnic background.

Data based on the 2021 Census shows that the City has a growing diverse ethnicity profile comparatively amongst our staff compared to our residential and workforce populations, however we need to work more innovatively to improve this for officers.

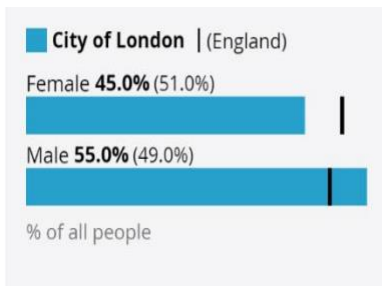
### Officer Gender Profile (%)



### Staff Gender Profile (%)



### Gender (residential):



As of 2022, the **commuter workforce** gender split showed that 64% of workers identified as male with 36% identifying as female.

Data based on the 2021 Census shows that the City has a largely equal gender residential split, although less so for our workers. This is reflected across our staff profile and shows that we need to work more innovatively to improve this for officers.

Our representation levels are continuing to improve through our recent recruitment initiatives under the police uplift programme which have contributed to increased diversity. However, we need to do much more to improve the pace of this change. A significant impact will need to be made through our recruitment and retention strategies which will incorporate additional outreach activities to attract more people from under-represented groups, particularly women and those from minority ethnic backgrounds. We also need to improve upon how we more accurately measure representation beyond our residential population to understand how we represent our workers and leisure visitors across the City of London.

One area of work will be to continue to provide targeted support to people from under-represented groups throughout the recruitment process, probation period and career pathways. Our employees should see diversity represented in our senior leadership across all ranks and grades. Finding ways to attract and retain diverse leaders is key to fostering an inclusive workplace, it also demonstrates to our employees that representation is a priority for all.

### **Positive action schemes that support officers and staff from under-represented groups to develop laterally and through promotion:**

We will continue to operate positive action development schemes to help bridge our representation gaps within and across different levels of the organisation by providing targeted support and opportunities to these under-represented groups.

In our recent promotions for Inspectors and Sergeants, HR collaborated with our Disability Enabling Network to ensure suitable reasonable adjustments were applied, making use of trained officers to assess individual adjustment requests and recommended necessary support.

Our PALS, the Positive Action Leadership Scheme, launched in 2021, which empowers officers and staff from visible Black or ethnic minority backgrounds with vital career development tools. Comprising six modules delivered over nine months, it focuses on presentation skills, networking, confidence-building, mentoring, and strategic awareness. Increased participation in 2022 highlights its success, and its continuation in 2023 reinforces our commitment to a more diverse and inclusive leadership team. Future work will involve providing these schemes to other under-represented groups. Next year we will also launch our new Sponsorship Scheme, an initiative adapted from the NHS which has created an ongoing partnership to share best practice across EDI activity.

### **Leaders championing and being accountable for equity, diversity and inclusion:**

Lessons learned from Operation Hotton, have been just as important to our organisation as all forces nationally, to recognise the importance of supervision and leadership which sets the right tone and supports those who challenge poor behaviour.

Professionally developing our supervisors and line managers and also creating a culture of inclusive leadership is a crucial focus for us in the challenging yet rewarding role of policing. We have refreshed our Core Leadership Programme and Management Development Programme for supervisors and first-line managers. Additionally, our promotion framework and performance development process requires leaders to demonstrate their contribution to equity, diversity and inclusion.

The annual staff survey and pulse surveys are important opportunities for us to gauge employee feelings, allowing us to address concerns and improve psychological and emotional safety. All of our senior leaders have been given personal responsibility to improve outcomes from the staff survey.

Above all, we do not underestimate the role which our Senior Leaders have to foster an equitable, diverse and inclusive workplace. We know that irrespective of how many diversity training and inclusion programs we incorporate into our organisation, all efforts will be hampered without our Senior Leaders being visible and pro-active in their support. We will achieve this by ensuring EDI advocacy becomes a focus of all that we do. This will be seen through our continued work to actively champion inclusivity schemes such as PALs and our Sponsorship Scheme, and also how our senior leaders role-model inclusive behaviour in their people management and across their own leadership teams.

## **Fostering an inclusive culture where our people feel a sense of belonging:**

The Our People Inclusivity Programme, launched in 2022 and 2023, is a series of mandated events that allow participants to reflect on the significance of creating an inclusive culture. These events serve as gateways to a broader Inclusivity Programme, where all employees are required to undertake continuous professional development in this area through a blended learning approach.

The Programme also contains a focus on supporting, developing and retaining our neurodivergent colleagues. Policing has become far more attuned to reasonable work adjustments, particularly when thinking about neurodiversity; ranging from adjusting the working environment to providing software to assist with typing. However, we are now more switched on regarding the strengths, values and diversity of thought which this brings to our organisation. This is especially beneficial within our National Lead Force areas of Fraud and Cyber where often our neurodivergent colleagues can see solutions where others can't through different thinking and approaches.

Complementing the Inclusivity Programme will be a series of pro-active and innovative team cultural audits which looks at the internal conduct and culture of teams. The cultural audit will provide the workforce with an opportunity to share how they feel about their immediate work environment, as well as the wider workforce. The results of the cultural audit will provide managers with an understanding of underlying issues or concerns which may not have been formalised and the support and tools to address these and give confidence to the workforce that issues are being logged. The cultural reviews will also allow the force to have an understanding of risk areas or emerging themes needing closer attention and action.

Recognising the unique challenges which policing can bring, especially for frontline employees, we have prioritised supporting our new recruits, particularly probationer officers. The Buddy Scheme and Friendly Ear program provide access to professional support from colleagues and continue to grow in attrition.

## **Dealing swiftly with discrimination, micro-aggressions and similar inappropriate conduct:**

It is vital that all those who work in policing have trust and have confidence in the police as their employer and feel empowered to uphold the high standards that the public rightly expect. To do that they must feel supported, especially when they are raising concerns and identifying where standards need to improve.

In response, we are strengthening our recruitment and vetting procedures to prevent unsuitable individuals from pursuing or continuing careers in policing. The findings from the Casey Review were a difficult read and hard hitting for everyone in policing, but brought with it a number of recommendations to focus on the need to strengthen the vetting and disciplinary system – ensuring only the right people come into policing and those who do not meet the standards are quickly removed.

We have invested in our Professional Standards Department capabilities to address increased reporting and robustly deal with anyone who does not meet our high standards of behaviour or demonstrates discriminatory beliefs. Resourcing has been increased in this area to conduct enhanced prevention work, including risk profiling to embed early interventions and prevent escalation. Our Professional Standards Department is also managing a number of activities within

the [Police Race Action Plan: Improving policing for Black people \(college.police.uk\)](https://college.police.uk) in order to improve trust and confidence for our employees and external Black and minority ethnic communities in this area.

One area of focus is to continue in prioritising our response in tackling incidents of internal misogyny as set out in our [Strategic Delivery Plan for Violence Against Women and Girls | City of London Police](#). We have already implemented a number of internal innovative initiatives, some examples include:

- Holding listening circles for women throughout 2022, where female colleagues could safely share experiences and concerns, and find ways to deliver real change for women working for the City of London Police. This was identified as best practice by the College of Policing nationally and implemented by a number of other forces.
- Delivering the ‘Leading with Impact’ professional and personal development course to female officers and staff.
- Improving how the City of London Police uncovers and deals with misconduct by: increasing colleagues’ awareness of early indicators of unacceptable behaviour; highlighting [different routes for reporting concerns about behaviour and misconduct](#); and reviewing historic cases and our vetting processes.
- Accepting the recommendations made by the NPCC and College of Policing in their [review of themes, learnings and recommendations on police-perpetrated VAWG](#) (published October 2022) and continuing to work with stakeholders to address the recommendations made, including the development of a process map to formalise how cases of police-perpetrated domestic abuse are managed.
- Rolling out ‘Domestic Abuse Matters’ training to all police officers, and police staff in relevant roles last year, with more than 300 colleagues having taken part in the training designed to change and challenge the attitudes, culture and behaviour of colleagues when responding to domestic abuse.
- Publicising forthcoming [misconduct hearings](#) on our public-facing website and detailing the outcome of these, including where an officer is added to the police barred list.
- Taking every opportunity to promote awareness of action to address VAWG, with the [Commissioner opening the City of London Crime Prevention Association’s related event in February 2023](#).
- Issuing the [Professionalism newsletter](#) to colleagues every quarter, providing learning from complaints and conduct, national cases of significance and activity or information that supports our Standards of Professional Behaviour.



- Introducing 'Walk & Talk'; a scheme whereby women visiting, working or living in the city can walk and talk with police officers, to share their thoughts on safety to bring about positive change.

Our values denounce racism and any form of discrimination as we are committed to becoming an anti-racist organisation. We wholeheartedly support the National Police Race Action Plan, and are delighted to be an Ice Breaker force to showcase our work in adopting it into our delivery plan to rebuild trust with our Black employees and communities. Together, we are embarking on a mission to challenge and eliminate bias, ensuring that our organisation is a place where discrimination has no room to breathe.

Our commitment goes beyond merely being "not racist." We aim to become an actively anti-racist organisation that Black people can trust. This plan demonstrates our zero-tolerance stance on racism and our determination to make further progress in collaboration with all staff networks and associations, especially the Black Police Association (BPA). Together, we will work towards creating an environment that promotes trust and inclusivity.

While we recognise the progress made, we acknowledge that more work is needed. We are committed to addressing racism, discrimination, and bias at all levels, including policies and procedures that negatively impact Black individuals.

Our zero-tolerance approach towards racism is supported by a dedicated Professionalism and Trust team, working closely with all of our Networks and Associations. We hold each individual accountable to uphold these values, ensuring there is no place for racism within our organisation.

Examples of our innovative initiatives to deliver against our local Race Action Plan have included:

- Black History Month – our celebrations included a number of force wide events, including talks from inspirational people from the Black community.
- Sponsorship Programme - this year we are developing and launching a Sponsorship programme for our Black, Asian and minority ethnic colleagues. We are committed to ensuring that we support the investment in recruitment and also protect the retention of Black, Asian and minority ethnic Officers and Staff. This initiative will form part of our commitment to positive action and developing our leaders of the future.
- Positive Action Leadership Scheme – we will continue to deliver this successful programme and measure the impact it is making towards promotion and lateral achievements amongst these under-represented groups.
- Support for Promotion - a Promotion Development Programme is currently being developed to provide support to officers from under-represented groups who are applying for promotion up to Inspector rank. Not only will this further our business case for positive action, it will also help to ensure that City of London Police retains a diverse workforce. The programme will include inputs on dealing with barriers and risks, structuring best evidence, dealing with operational scenarios, current affairs in policing, navigating police culture and building confidence as future leaders. City of London Police will also include its sponsorship for females and minority ethnic

officers and staff to join the Future Supers programme, last year our Superintendent promotion process resulted in 4 out of 5 successful candidates being female.

The City of London Police has zero tolerance for any discrimination, bullying or harassment. We strictly adhere to the Equality Act 2010, safeguarding every individual from discrimination and harassment. We consider all protected characteristics, including age, disability, gender confirmation, race, religion, sex, sexual orientation, and gender identity. Bullying & Harassment are incompatible with our Values and will not be tolerated. We support affected colleagues, encourage a culture of openness around raising concerns, and provide mandatory training on unconscious bias to reduce prejudiced behaviours.

**Measures:**

- 1. Our recruitment activity is improving how well our workforce reflects the communities we serves.**
- 2. Under-represented groups have access to a dedicated support and careers programme for promotion and lateral development.**
- 3. Annual workforce data on recruitment and retention shows similar progression rates for officers and staff across all under-represented groups.**
- 4. Leaders are held accountable for staff survey results to show improved outcomes in engagement and sense of belonging.**
- 5. Year-on-year increases in the proportion of employees who self-declare their diversity characteristics.**
- 6. Our Inclusive Employers benchmark score improves to 'Integrated' with national best practice safeguards to deal with all forms of discrimination by 2027.**
- 7. Our Reward and Recognition processes identify and celebrate those modelling positive EDI behaviours.**
- 8. The evaluation of our Inclusivity Programme demonstrates that we are positively improving culture and feelings of belonging.**

## SECTION 05:

**OUR PUBLIC: *Equity and inclusion is central to how we deliver our service (local and national communities) and the public trust us to act fairly and with integrity.***

We will achieve this by:

- a) Understanding and engaging with all our communities so we can measure the impact of our priorities and services, adjusting the policing provisions and services accordingly
- b) acting with cultural awareness to ensure that all our communities are treated with fairness, dignity and respect
- c) maintaining the highest standards of response to hate crime, ensuring we take action to provide appropriate and sensitive community reassurance

### **Understanding and engaging with all our communities so we can measure the impact of our priorities and services, adjusting the policing provisions and services accordingly:**

A community profile will map the diverse communities in the City of London. This will be regularly updated and made available to our people and the public. We will use this information to target our engagement activity ensuring it is representative of all our communities and uses the most appropriate channels.

To better understand the needs of our communities, we are developing a new community feedback platform and community survey to provide more accessible opportunities for our residents, workers and visitors to share their experiences and views. The survey will be invaluable in achieving a better feel for what policing issues matter the most to the public we serve right now. [Community feedback | City of London Police](#)

This understanding will extend beyond our territorial policing obligations to how we support communities in our national lead force responsibilities. As part of this commitment, we will remain forward-thinking in how we ensure our digital and in-person services support all of our communities. This ranges from accessibility of language and print to signposting those from vulnerable or underrepresented groups who require additional support through our new 'Next Generation Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) project'.

Our engagement with communities who have lower levels of trust in policing is particularly important. Through regular dialogues and forums, we aim to collaboratively address concerns,

gather feedback, and foster open lines of communication. We recognise that improving trust and confidence must be met with action and we will be steadfast in our commitment to driving meaningful change through our localised Race Action Plan and Violence Against Women and Girls Action Plan. Our plans link into the national Police Race Action Plan Strategy and the NPCC (National Police Chief's Council) Violence Against Women and Girls strategy, ensuring that we are working collectively to improve trust and confidence across our national and our local communities.

Through our implementation of the national Police Race Action Plan we will drive activity to increase the involvement of Black communities and those from other ethnic minority groups, in the work that we do. Our engagement plans set out a series of actions that will support a step change in the way that we engage with, and respond to input and feedback from these communities, particularly digital engagement platforms to capture our transient Black business and leisure communities. We will also work to attract greater involvement of these communities in our IASG and workforce to provide oversight and scrutiny activity, as well as input to inform our strategic decision-making at key governance boards.

The NPCC Violence Against Women and Girls Strategy was launched a year prior to the national Police Race Action Plan, meaning that we have already embedded a number of community engagement initiatives, and can bring the learning and best practice into how we engage with our Black communities. Examples can be seen through our successful Operation Reframe events and our Walk & Talk schemes to bring about positive change within the City.

**Acting with cultural awareness to ensure that all our communities are treated with fairness, dignity and respect:**

In 2022, a dedicated 'Professionalism & Trust' department was established to bring together key areas of policing which work towards rebuilding trust and confidence internally and amongst our communities:

Through this department, we support our Policing Plan objective of continuous improvement and learning from experiences. We encourage a culture of learning and development, seeking lessons from other organisations, experimenting with new ideas, and using feedback from colleagues, partners, the public, and academia to improve our approach to policing diverse communities.

We will continue to develop our wide range of innovative approaches to engage with our communities and increase confidence in policing, particularly amongst those groups who have lower levels of trust and confidence. We will ensure our officers are knowledgeable about the diverse needs of our communities, and are well-trained in key aspects of equity, diversity and inclusion. For example, we are working with the Mentivity community group to improve our understanding of, and engagement with young Black people.

As seen through our ADHD pilot and other innovative schemes, we will ensure detainees receive the care and support they need, fostering a compassionate and responsible approach to policing. This includes provision of additional support for people with mental health concerns.

**Maintaining the highest standards of response to hate crime, ensuring we take action to provide appropriate and sensitive community reassurance:**

Our approach to tackling hate crime will be informed by national best practice. This will be a multi-faceted approach which involves a pro-active stance on prevention, involving educational initiatives which raise awareness about hate crime and broader crime where discrimination is a factor, developing our collaborative partnerships with community organisations, schools, and religious institutions to foster a culture of tolerance, diversity and mutual understanding. Maintaining precise records of hate crime incidents will enable us to develop opportunities to prevent. We will also maintain transparency in our performance in this area with regular publication of hate crime statistics.

In our policing response to serve all communities, we will continue to prioritise the safety and well-being of victims of hate (and other) crime, a firm commitment in our Policing Plan.

Other examples of our community initiatives to deliver against our Action Plans have included:

Focus on... 'Gypsy, Roma, Traveller (GRT)':

In celebration of GRT month, an awareness talk was delivered to 148 members of staff regarding GRT history, and discrimination suffered by the community historically, through to the present day. Stereotypes and the damage these cause are discussed, and an emphasis placed on valuing and respecting GRT culture and values.

Focus on... 'Find your Why':

Delivered by Asif Sadiq, a former CoLP officer, who brings a wealth of diversity and inclusion knowledge from his former position as Global Head of Diversity, Inclusion, and Social Impact at Adidas, and in his current position as Chief Global Diversity, Equity, and Inclusion Officer at Warner Bros. Discovery.

Apology letter to the LGBTQ+ community:

The Commissioner recognised and acknowledged the harmful way in which the LGBTQ+ was historically policed which undermined the trust and confidence in policing by this community. Peter Tatchell, Director of the Peter Tatchell Foundation, acknowledged the importance of this apology for the LGBTQ+ community.

'Alter Egos Theatre Company Presents...':

Alter Ego are one of the UK's leading Social Change Theatre and Film production companies. They have worked with CoLP's Professionalism & Trust (P&T) Team to create a bespoke product aimed at improving awareness of misogynistic behaviours and how to tackle them in the workplace. Alter Egos have already delivered successful inputs to Colleges and Universities, the NHS, Social Services, other Police Forces and the Ministry of Defence.

'Mentivity' Inputs:

Consist of whole-day in-person sessions, aimed at gaining insight into young Black people's experiences of interacting with the police. The Charity's founder, Sayce Holmes-Lewis, started the charity following his experience of being stopped & searched, and works with police forces to increase understandings of Black peoples' experiences and perceptions, and has regularly delivered training to CoLP's officers.

Focus on... 'Be Lads':

An awareness and safety campaign which provides practical advice to men, to assist women in feeling safer when they are walking alone. It recognises that most men do not wish to be perceived as threats to women and addresses why women are justified in being concerned as such. Following the tragic death of Sarah Everard, the conversation around women's safety is more important now than ever before. 'Be Lads' explains the significance of this event and the way it has fractured the public's faith in policing, without vilifying all police officers.

**Measures:**

- 9. We have a demonstrable understanding of the diverse needs of local and national communities.**
- 10. Our public feedback is positive around the skills and capabilities of our employees in dealing with EDI related issues.**
- 11. Arrangements for consulting and working with our communities, particularly those from under-represented groups are in place.**
- 12. Our positive outcome rate for investigating Hate Crime is higher than the national average.**

## SECTION 06:

### **OUR PROCESSES AND POLICIES: *Our policies, processes and procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies.***

#### **13. Our public have confidence in the City of London Police.**

We achieve this by:

- a) analysing and publishing data on disproportionality and use of police powers, at least annually, with a reform or explain approach where required
- b) ensuring internal and external scrutiny and decision-making include a range of perspectives that are representative of our workforce and communities
- c) engaging regularly with staff networks and associations so their perspectives and concerns are considered
- d) ensuring policies and practices enhance workforce equity and inclusion, including workplace adjustments, equal pay, flexible working with a clear and transparent process around promotion opportunities

#### **Analysing and publishing data on disproportionality and use of police powers, at least annually, with a reform or explain approach where required:**

We understand that the impact of how we use our police powers, especially stop and search and use of force, significantly impacts minority ethnic communities and influences trust and confidence in the police. To address this, we have implemented robust processes for scrutiny of the use of these powers. These processes enable us to examine and develop our understanding where disproportionality in our actions exists, supplemented by our work with our communities and partners as part of the National Police Race Action Plan to improve how we can reform or improve our ability to explain. By continuously evaluating and refining our practices collaboratively, we strive to ensure fairness, transparency, and accountability in our interactions with all members of the community, fostering trust and confidence in our policing approach.

#### **Ensuring internal and external scrutiny and decision-making is informed by a range of perspectives that are representative of our workforce and communities:**

The City of London's Police Authority Board and its Professional Standards & Integrity Committee (PSIC) have also become more representative of our communities, this enables them to apply scrutiny and monitor performance with a diverse lens. They play a vital role in helping us to embed equity, diversity and inclusion through all areas of policing. Both the Police Authority

Board and Professional Standards & Integrity Committee ensure that complaints and misconduct with a discriminatory nature are closely scrutinised along with our stop and search and use of force data. They also monitor our representation across officer and police staff numbers, and examine how we engage with our communities, particularly those from under-represented groups.

Our Independent Advisory Scrutiny Group (IASG) comprises of independent community members, representing residents, businesses, and diverse groups in Greater London, including under-represented populations. As recommended in [The Macpherson Report: twenty-one years on \(parliament.uk\)](#), the IASG facilitates two-way dialogue between the police and communities, promoting effective engagement and community reassurance. The IASG plays a vital role in scrutinising specific policing areas, such as stop and search data, use of force data, and public complaints. Their feedback and voice enable us to improve our interactions with both employees and communities, fostering transparency and accountability.

Recognising the need for a youth perspective, we are launching a Youth IASG led by individuals aged 14 to 18. This new group empowers young people to influence policing practices and build trust and confidence within all communities. By including their views, we aim to enhance the quality of our policing services and cater to the needs of our youth population effectively.

We recognise that we have a deep impact on the communities we serve, and decisions made by the police can profoundly influence people's lives. By involving external community groups in the scrutiny process, we ensure that diverse perspectives, concerns, and experiences are taken into account when evaluating our practices and policies.

Internally, our recruitment efforts have resulted in growing diversity, leading to a wider range of perspectives and contributing to a truly inclusive workplace. This diversity of thought has been invaluable in challenging our current practices and identifying areas for improvement in our inclusivity journey.

**Engaging regularly with staff networks and associations so their perspectives and concerns are considered:**

Involvement of internal and external communities, including our own Staff Networks and Associations, provides us with 'checks and balances' on our decisions and behaviours, it can also help us to identify biases and blind-spots in our decision-making processes. By bringing attention to these issues, we can work towards more equitable and fair practices.

Each Network and Association has a senior Diversity Champion who supports their goals, champions workstreams and promotes achievements through the EDI Strategic delivery board. This regular engagement cultivates continuous improvement for the organisation as it encourages a proactive approach to addressing concerns and making necessary adjustments to our policies and procedures. Our Networks and Associations also participate in a number of our key decision



boards to ensure that the perspectives of our employees and communities they represent are considered.

**Ensuring policies and practices enhance workforce equity and inclusion, including workplace adjustments, equal pay, flexible working with a clear and transparent process around promotion opportunities:**

Recognising the historical barriers to diversity in policing, particularly related to race, gender, and sexual orientation, we have taken proactive steps to address these issues. Our Staff Networks and the newly formed Professionalism and Trust team have played a crucial role in driving these changes. As a result of their work, we have introduced important updates to our policies and procedures. These include the development of a Sponsorship Scheme to support Black and ethnic minority employees, a refreshed policy on Transgender and Gender, and a staged return to work policy for those returning from parental leave.

We appreciate that achieving true equality involves ongoing efforts to address and minimize disadvantages faced by individuals due to their protected characteristics. The Equality Act 2010 forms the backbone of our commitment, providing a comprehensive legal framework for protecting individuals from various forms of discrimination.

At the heart of our approach is an understanding and appreciation of intersectionality across protected characteristics. We acknowledge that individuals can experience multiple forms of inequality or disadvantage, and these complexities can compound, creating unique obstacles that require careful consideration. To address this, we ensure that intersectionality is ingrained in our decision-making processes. Every policy undergoes an Equality Impact Assessment (EIA) Review, and those policies directly affecting protected groups are additionally scrutinised at our Equity, Diversity, and Inclusion Strategic Board. This board is chaired by the Commissioner and includes representatives from all employee Networks and Associations, guaranteeing that a diverse array of perspectives are considered.

While the Equality Act outlines the general duty for public authorities to combat discrimination, it does not prescribe specific methods. However, we recognise the importance of conducting Equality Impact Assessments (EIA) to uphold our commitment to inclusivity. EIAs serve as an effective tool to ensure that both new and existing policies are fair, inclusive, and free from discrimination. The EIA process also systematically reviews policies to eliminate unconscious bias and ensure fairness in our decisions. This commitment reinforces our ethical practices and creates a positive impact on communities and suppliers.

By adhering to these principles, continuing to link in with the College of Policing to access national best practice and embedding EDI considerations into all our activities, we will continually strive to create a safe and inclusive environment for everyone who works for us and the valued communities we serve.

**Measures:**

- 14) Our key decisions are informed by our engagement with our Networks and Community groups.**
- 15) Our policies are reviewed annually to ensure they do not promote structural or systematic inequalities.**
- 16) Our EDI Strategic Board members feedback that there is a coherent approach to implementing our Strategic objectives across our organisation.**
- 17) Our organisation has policies and procedures in place which are actively used to promote equality by managers.**
- 18) There are high satisfaction levels across all staff networks and associations in respect of engagement on our policies and procedures.**
- 19) Structural and systemic inequalities are reduced as a result of the community and workforce scrutiny and contribution into our policies and procedures.**

## SECTION 07:

### OUR PARTNERS: *We influence equity and inclusion through our network and supply chain.*

We will achieve this by:

- a) Contributing to development and delivery of the wider City of London Corporation equity and inclusion strategy.
- b) Embedding equity, diversity and inclusion throughout the contract process and work with suppliers who are diverse owned enterprises and/or have proven to take active steps within their own organisations, supply chain and industry.
- c) Using our understanding of local communities/protected characteristics needs to inform partnership activities to keep communities safe.

#### **Contribute to development and delivery of the wider City of London Corporation equity and inclusion strategy:**

Our organisation already aligns itself to the City of London Corporation's Equity and Inclusion priorities, this includes supporting the application of their policies across our workforce, supply chains, partnership standards and ethical procurement. We will engage with the Corporation on their new EDI strategy and consider how we can collaborate to achieve common goals.

#### **Embedding equity, diversity and inclusion throughout the contract process and work with suppliers who are diverse owned enterprises and/or have proven to take active steps within their own organisations, supply chain and industry:**

The organisations we choose to work with and the partnerships we build, have implications on the trust and confidence communities have in us. By prioritising fair treatment of workers and respecting human rights in our ethical procurement practices, our organisation demonstrates our commitment to social justice and fairness.

Within this we will support the City of London Corporation's Responsible Procurement Commitments to embed equity, diversity and inclusion throughout our contract process and work with suppliers who have proven to take active steps within their own organisations, supply chain and industry. This will also include working with suppliers who undertake due diligence to guard against modern slavery and other human rights abuses.

## **Use our understanding of local communities/protected characteristics needs to inform partnership activities to keep communities safe:**

Recognising the power of community insight, we know that their knowledge aids our ability to identify risks and emerging issues early on. This understanding is particularly pivotal for communities with diverse characteristics and those from underrepresented groups who tend to have lower levels of trust towards policing. Our strategy seeks to bridge this trust gap. By listening actively and comprehending concerns, we aim to dissolve barriers and foster relationships towards a collaborative and responsive policing service for all. Working in collaboration with the Corporation, our Secure City Programme is an example of this, delivering state-of-the-art technology upgrades to maximise safety in the square mile; keeping people safe and feeling safe. This particularly provides enhanced protection for groups who are more acutely affected by hate crime and hate incidents.

Continuing to build relationships with community groups and non-profit organisations will help us to understand and work collaboratively to keep our communities safe. This is why we have integrated our work with charities such as Mentivity and public initiatives such as our 'Walk and Talk' scheme to help provide us with continued insight into the experiences of those who tend to have lower levels of trust and confidence in the police.

Our new Neighbourhood Policing Strategy involves working with our partners and communities to prevent and reduce crime and embed long-term problem-solving solutions. In keeping our communities safe, we recognise that this is a whole-system approach. This is why working with our Business Improvement Districts as part of the Safer City Partnership, and engagement through our Dedicated Ward Panels has been such a success in delivering high quality community safety interventions for all our national and local communities.

We also recognise that our communities are continually changing. New investment and regeneration in the City will play an integral part in the Destination City vision, boosting the City's leisure offer for visitors, workers, residents and other stakeholders. Working closely with the Corporation we will continue to maintain an understanding of how we will need to adapt our policing approach to serve our existing and future communities.

### **Measures:**

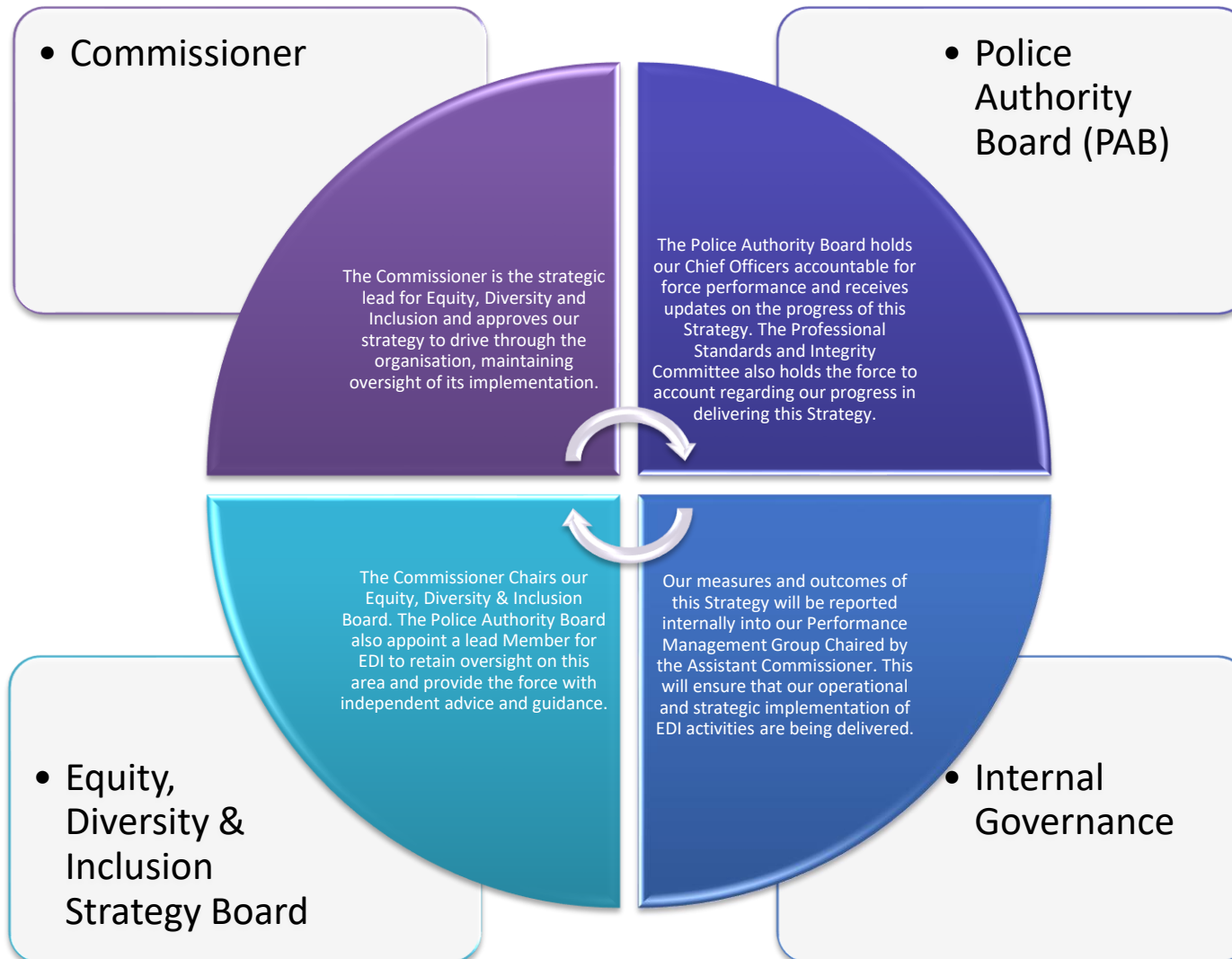
**20) We have engaged and active staff Associations and Networks acting as support to our workforce and providing critical challenge to the organisation.**

**21) We support the City of London Corporation's Responsible Procurement Commitments by ensuring that EDI becomes part of our procurement assessments.**

**22) We demonstrate how meaningful engagement with our local communities has contributed to the shaping and influencing the outcome of force policy and activities.**

## SECTION 08:

# GOVERNANCE AND ORGANISATIONAL PERFORMANCE AGAINST OUR STRATEGY



# *Thank you!*

In writing this Strategy, we are grateful to the continued support of our Networks, Associations, Diversity Champions and Community Groups who dedicate time to raise awareness of their work in Diversity, Equity and Inclusion. They also act as valued critical friends through regular conversations with our Commissioner and providing valuable advice at governance boards. These conversations help to inform the organisation on the actions we need to take to create an environment where everyone feels they belong and will guide us on our journey to become the most inclusive police service in the country.