

Appendix 1- Report delivered at EDI Strategic Board (8th May) and Chief Officer Meeting (9th May) updating on ICOD Priorities and EDI Implementation

Summary

This paper provides Chief Officers with an update on the priorities of the Inclusivity, Culture and Organisational Development (ICOD) team for the following year. This links in with the team's ongoing work on the EDI Strategy Implementation Framework and accompanying Implementation Plan presented to PSIC earlier this year.

Main Report

BACKGROUND:

Our new Equity, Diversity and Inclusion (EDI) Strategy was launched in July 2024 following extensive consultation. It makes a series of commitment statements to run over the next 3 years under 4 key themes:-

1. ***Our People***- increasing diverse representation, improving our standards and ethics, driving inclusive leadership and individual accountability, creating an equitable working culture and delivering zero tolerance on behaviours which compromise this.
2. ***Our Policies and Processes***- ensuring they are equitable, accessible, inclusive and informed through diverse representation of our police and by independent scrutiny.
3. ***Our Public***- building and sustaining authentic engagement with our communities to ensure their confidence in our policing.
4. ***Our Partners***- leading by example in building inclusive relationships and fostering innovative collaboration.

The Strategy acknowledges that delivery against these commitments in the City of London Police is not new; on the contrary, the document outlines the progress we have already made in this field. It enhances this further by creating a structure around what currently exists (under the '4P headings), along with defining our future direction and how we will measure success.

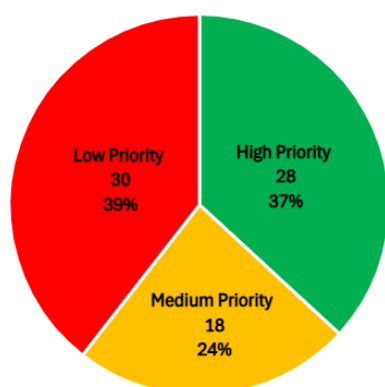
APPROACH

We have worked with our internal stakeholders (including our Staff Networks and Associations) along with external partners (including EDI specialists such as Business Disability Forum and Inclusive Employers), to help inform our priorities for the forthcoming year. Instrumental to this has been our close working relationship with

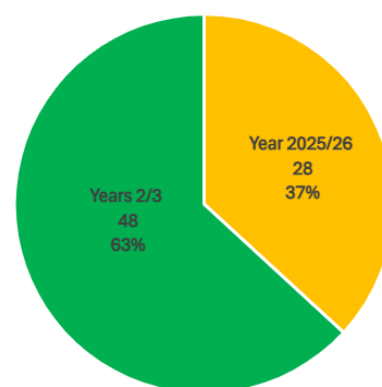
colleagues in the Corporation who we continue to work with in refining our EDI framework and implementation plan.

This has resulted in an extensive plan of work with 76 individual actions across the '4P' areas, some of which have been completed and many of which are in progress. As a 3-year plan, it is ambitious. However, we have prioritised them in to 'high', 'medium' and 'low' categories and aligned our annual plans to this. As a result, 28 of the 76 actions become priorities we will progress in 2025/6.

ICOD Priority Rating by Year



2025/26 Priorities vs. Years 2/3



Although it is widely acknowledged that EDI is 'everyone's business' within CoLP and we need to ensure a forcewide approach to many of the tasks, we also appreciate that much of the activity and co-ordination will be driven by the ICOD team. We have worked collectively to identify three strategic priorities along with ten key deliverables we would want to progress. We have conducted the first of a series of internal workshops to task actions and create quarterly milestones and predictions within the team. We continue to work closely with our colleagues at the Corporation to further refine our Implementation framework.

OVERALL AMBITION

Our overall EDI ambition, to become 'one of' the most inclusive and trusted police services in the UK, must be the driver for all of our activity. This commitment was made at the EDI launch and has been consistently spoken of in boards and other events. It is imperative we deliver on this and keep it at forefront of our work, mindful this ambition is also highlighted within our Policing Plan. In keeping EDI Strategy as our core doctrine in this space, we need to remain consistent with our '4P approach' and again ensure these thematic areas are all being served.

Our wider EDI workplan is ambitious; we believe that to achieve our EDI ambitions, it absolutely needs to be. However, we recognise the impact that the dynamic nature of the portfolio and the resourcing and capability gaps which exist in the team have on

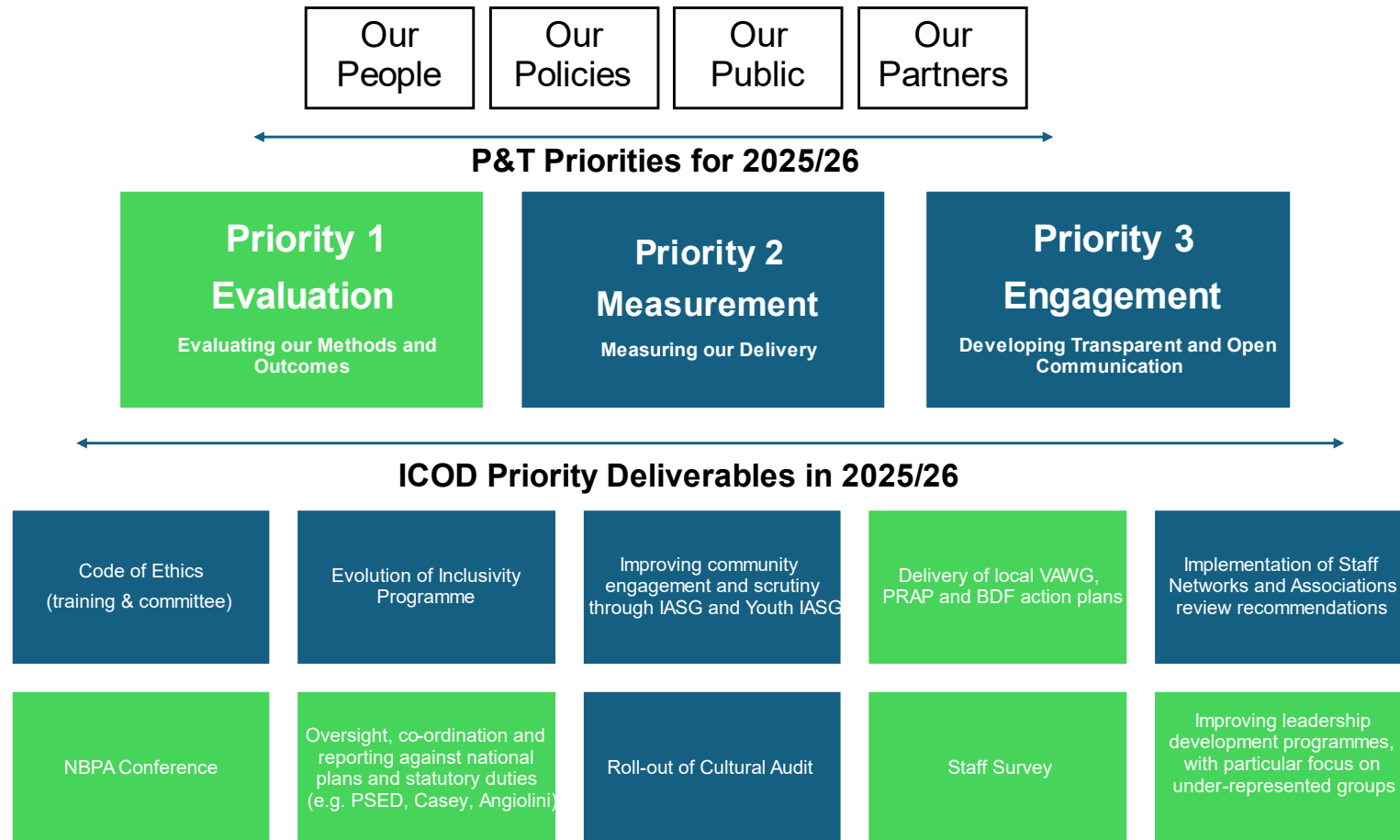
capacity, which means that we need to prioritise our efforts over the next 3 years to meet our aims.

As part of our ongoing accreditation journey, Inclusive Employers estimate that the journey to progress from 'Silver' to 'Gold' can take anywhere from 3 to 5 years. This requires that we lay down some solid foundations in areas which have previously been overlooked due to the pace and speed of progress, bringing us to our 3 thematic priorities.

The diagram below outlines those priorities and key deliverables we would want to progress and deliver over the next 12 months to place CoLP in the best position to make meaningful progress towards our EDI ambitions. However, when reflecting on the resources and skills gap, coupled with new portfolio responsibilities, linked to Wellbeing (culture) and National Talent Development; alongside emergent issues such the recent Supreme Court ruling; these priorities and key deliverables have been further refined to reflect the actual capacity within the team to deliver them. The impact of this refinement is reflected in the diagram:

- Of the three thematic priorities identified, only 'Priority 1 – Evaluation' (backfilled in green), will be progressed to completion in 2025/26. The remaining two thematics will remain a priority but will not be delivered over the next 12 months without changes to the current capacity or skills gap.
- Of the ten key deliverables identified, five will be progressed to completion in 2025/26 (backfilled in green). These include NBPA conference, Reporting as per our Statutory Duties and National Plans, Staff Survey, Leadership development and delivery of local VAWG, PRAP and BDF action plans. The remaining five key deliverables will not be delivered in the next 12 months without changes to the current capacity or skills gap.

CoLP EDI Ambition ~~To~~ To be one of the most inclusive and trusted police services in the



ICOD THEMATIC PRIORITIES

What we can deliver:

Priority 1- Evaluation

This has long been acknowledged as a weakness within EDI, L&D and Policing more generally. A number of projects have been underway for some time, including our Positive Action Leadership Scheme (PALs) and Inclusivity Programme. Albeit we conduct a basic evaluation of these initiatives (a 'teams' survey asking participants whether they found sessions valuable and would they recommend), we need to build on this to truly understand how they impact on behaviour change and progression within. In working with partners in private sector and academia, we are drafting our first evaluation strategy and with our new Organisational Development practitioner soon to be joining our team, will be able to dedicate resource to this.

Action Checkpoint

In 2025/26 we will-

- Consult with external experts
- Write our first Evaluation Strategy
- Implement our Programme of Evaluation

What we can deliver with additional support/resources:

Priority 2- Measurement

Within our EDI strategy, we have detailed the metrics we will use to measure our impact. This will include our progress against, to name a few: diverse representation within our organisation, disproportionality (around use of force, stop & search, PSD data and criminal justice outcomes), community satisfaction and ethical partnerships. In acknowledging the demand for research and analysis across the force, we know we need to make best use of shared resources as well as investing in upskilling our team to be able to identify, capture and interpret both quantitative and qualitative data. We need to present this at our EDI boards to showcase progress but also identify areas of concern so that can be addressed.

Action Checkpoint

In 2025/26 we will-

- Produce dashboards for each of our 4Ps
- Use data to inform Problem Statements
- Highlight gaps in our metric capability with a view to innovating solutions

Priority 3- Engagement

Key to successful policing engagement is ensuring that we are operating with absolute transparency across all our workstreams and

that we are communicating this effectively to our communities. This is relevant both internally, where we are actively creating psychologically safe spaces for colleagues' voices to be heard through our cultural audits and listening circles, and externally, where we aim to build our programme of existing work with youth groups and our wider community. Alongside this, we need to build a 'one stop shop' for force EDI on our intranet space to ensure ease of access to our workplans, toolkits and offerings from our Inclusivity Programme.

Action Checkpoint

In 2025/26 we will-

- Refresh and revamp our EDI intranet pages
- Work with colleagues in Corporate Communication to develop a communication plan for EDI
- Review and refresh the Youth Independent Advisory Group and Independent Advisory & Scrutiny Group

**ICOD
PRIORITY**

DELIVERABLES

What we can deliver:

1) Delivery of VAWG, PRAP and BDF Action Plans

ICOD are responsible for the co-ordination and delivery against a number of 'localised' action plans including Violence Against Women and Girls (VAWG), Police Race Action Plan (PRAP) and our Business Disability Forum (BDF). These are driven by our National Police Chief's Council and their respective leads, with some additional requirements from the College of Policing (for example, Code of Ethics).

It is worth noting that there are other ‘National’ Action Plans in circulation which are not mandatory for forces to complete- for example, a National LGBTQ+ Strategic Plan. Our review of the landscape will identify which plans exist, to ensure appropriate governance, co-ordination, delivery and reporting.

Action Checkpoint

In 2025/26 we will-

- Create working group for Police Race Action Plan to feed local and national updates.
- Create working group for VAWG Action Plan to feed local and national updates
- Review the EDI landscape for National Policing Plans / Recommendations to ensure feed through to CoLP

2) National Black Police Association (NBPA) Conference 2025

This is the only action within the plan, which was not referenced specifically within the EDI strategy, it has only recently been confirmed that CoLP would be hosting this year’s event. We understand that this opportunity will take up considerable resource at varying points during the planning stages, it will require ongoing collaboration with our own local BPA, the NBPA, along with our internal and external stakeholders. We are already experiencing some of the political sensitivities and challenges that this presents and will need to be properly managed going ahead. We recognise the importance of ensuring that, as hosts, we deliver an exceptional event.

Action Checkpoint

In 2025/26 we will-

- Support the Planning Committee for the NBPA Conference 2025, providing the core link between our local BPA and others
- Ensure a full programme of evaluation for this event, including legacy for CoLP and Corporation
- Provide training and development opportunities for our Network Members

3) Staff Survey

The force entered a three-year partnership with staff survey provider 'Any-3' in 2022 and we launched our third Staff Survey in March 2025. A comprehensive communication plan has ensured consistent response rates, alongside which we have seen an improvement in engagement scores. Our focus this year will be on ensuring completion of improvement plans by Supervisors, with a communication plan wrapped around this. Once this year's survey is completed, a Force report will be sent to the Chief Officer Team and Senior Leadership Teams, this will then be followed by each department within Force being provided with a bespoke report relevant to their area(s) of responsibility. Managers will be asked to develop/amend (if required) their improvement plans in conjunction with team members. 'Any 3' will complete their three-year partnership with a Pulse Survey in Sept 2025 so we will also need to start our procurement process this year in readiness for the Staff Survey in 2026.

Action Check Point

In 2025/26 we will-

- Provide support to our leaders to produce development plans in response to their team results
- Begin procurement process for 2026 provider
- Update our force on results, thematic areas and organisational response

4) Delivery of Leadership Development Programmes

The PLP has been designed by the College of Policing to provide a comprehensive leadership development journey for the whole career of anyone working in policing. The Force is part of an NPCC pilot, partnering with Durham University and four other forces, who have collaboratively designed a programme mapped to the College of Policing's curriculum for first and mid-line leaders. Following a successful pilot in February 2025, ICOD are now supporting L&D in future roll out during 2025. Alongside this, we will continue to prioritise our leadership offering for diverse groups, ensuring appropriate accessibility and support.

Action Check Point

In 2025/26 we will-

- Conduct pilot of leadership training and implement recommendations into programme
- Prioritise rollout for our 530 (Sergeants/Inspectors and staff equivalents), with 120 expected Year 1
- Evaluate success / difference made and act on any recommendations

5) Oversight, co-ordination and reporting against National Plans and Statutory Duties

There are a number of statutory and legal obligations asked of ICOD; we need to publish our Annual Public Sector Equality Duty (PSED) by April of each year and, in addition to our gender pay gap, best practice suggests that forces should also include analysis of pay gaps between other groups i.e. race. Alongside this, a number of National Inquiries- for example Hotton, Casey and Angiolini- require CoLP to implement recommendations agreed by the Government, these also largely sit within the realm of Professionalism and Trust.

Action Check Point

In 2025/26 we will-

- Write and publish our PSED by May of each year
- Implement recommendations from Angiolini (Parts 1 through 3)
- Explore pay gap reporting in relation to race as per PRAP

What we can deliver with additional support/resources:

Committee)

6) Code of Ethics (Training and

Following the launch of the new Code of Ethics by the College of Policing last year, ICOD remain committed to its ongoing delivery, as announced at our workshop event last year. Alongside this we will continue to deliver our Ethical Dilemmas training as part of our Inclusivity Programme. We are also in the process of establishing our own internal Ethics Committee to help showcase the new code in action and provide additional scrutiny to our decision making. Although this area stretches across all 4 pillars of work (people, policies, partners and public), there is a clear link with our work on ethical partnerships and ensuring fairness of opportunity and social value within our supply chains.

Action Checkpoint

In 2025/26 we will-

- Write and agree TORs for a new Ethics Committee
- Decide on audience / chair for Ethics Committee and hold inaugural meeting
- Deliver 4 modules (minimum) of Ethical Dilemmas training across force

7) Evolution of Inclusivity Programme

Having launched in 2023, our Inclusivity Programme has now delivered over 2,000

sessions for our colleagues across modules including Active Bystander, Mentivity and Black History, Unconscious Bias, Understanding Neurodiversity, Tackling Violence Against Women and Girls, Challenging victim-blaming language, Understanding LGBTQ+ Terminology and Implementing Reasonable Adjustments. We are confident that our colleagues understand the expectation that there is now a mandatory requirement for them to complete 2 modules every year. However, our focus this year will be twofold: - firstly, a closer examination of compliance and monitoring attendance (including ensuring visibility from our Senior Leadership Team), and secondly, as alluded to previously, a stronger programme of evaluation to understand what difference is being made.

Action Checkpoint

In 2025/26 we will-

- Informed by data, deliver at least 12 different modules of activity across 12 months to facilitate completion of 2 mandatory modules per year.
- Understand compliance levels (know our baseline) and implement a strategy to improve upon this
- Implement evaluation strategy to understand impact and meaning.

8) Roll-out of Cultural Audit

As part of our proactive approach to understanding and mapping micro cultures and behaviours within CoLP, Phase 2 of our cultural audit has now been completed with 87 officers participating in total, a report of key findings and next steps have recently been presented to Chief Officers. This outlined the methodology utilised, key findings and recommendations for next steps. In conjunction

with feedback received following these initial discussions and next steps confirmed, ICOD continue to prioritise implementation of these improvements before prioritising further roll out across the force.

Action Check Point

In 2025/26 we will-

- Incorporate recommendations from COT into methodology
- Undertake minimum of four cultural audits
- Ensure availability of toolkit for use by line managers

9) Improving Community Engagement and Scrutiny through IASG and Youth IASG

ICOD has, as of January 2025, taken ownership of our Youth Independent Advisory Group (YIAG), where we continue to build on effective membership and engagement. As such, we expect a significant bulk of our Year 1 'public' focus to be on developing this group and maximising its impact and effectiveness. Similarly, we will work with colleagues in Local Policing to ensure connectivity and shared best practice between the YIAG and our Police Cadets, alongside more general youth engagement. We have already witnessed how powerful their insights can be following recent scrutiny of our Stop and Search procedure and process. All this will ensure effective governance, reporting and evolution of existing activity.

Action Checkpoint

In 2025/26 we will-

- Take full ownership of the YIAG
- Create a programme of activity for YIAG Year 1
- Agree reporting structure / information sharing protocol between ICOD and Local Policing for our Police Cadets

10)

Implementation of Staff Network and Associations Review Recommendations

We recently completed a review of our Staff Networks and Associations, implementing a number of recommendations relating to dedicated time for activities, governance, budgeting and training. Many of these relate to recommendations made by Inclusive

Employers and we are now in the process of actioning. Through continued delivery of our Network Chairs Meetings and ongoing support, ICOD will ensure that our people remain key consultants in any new policies or procedures. This priority is also mirrored by the Corporation who are ensuring their network members are empowered at grassroots level and have proper resourcing in place.

Action Checkpoint

In 2025/26 we will-

- Seek to properly understand the dedicated time required by our network members and put in place policy to support this.
- Ensure budgetary allowances are made for each Network /Association pending their submission request for the forthcoming year.
- Provide training and development opportunities for our Network Members

Additional Support & Resources

The staffing challenges within ICOD, linked to long-term sickness, vacancy and other abstractions has resulted in sustained resourcing gaps; displacing demand onto the remaining team and negatively impacting on health and wellbeing. While COT's commitment to supporting ICOD through prioritising recruitment to fill these gaps is welcomed, more help is needed.

Benchmarking has been completed, with 20 forces responding, to understand how delivery of EDI is resourced across policing. On average, of the forces that responded, their EDI teams numbered 8 FTEs. This compares favourably with CoLP who have 6 FTEs, including the following dedicated EDI posts: Chief Inspector, Sergeant, EDI Manager and 3 x PCs. This figure excludes the Superintendent post, which stretches across ICOD and L&D; providing strategic direction and governance, two Organisational Development Consultants and Staff Officer post.

Headline themes emerging from the benchmarking exercise include:

- Most forces utilise shared analytical support from force wide assets
- Some have dedicated asset

- Focus on youth engagement
- Most forces have VAWG/PRAP sitting separately to 'pure' EDI
- Many forces have 'positive action' posts
- Some forces have recognised the need for dedicated communication support

It was identified during the Business Planning Process that there is a lack of measurable demand and 'effort' data mapped against the establishment (which has never been met) or the current strength for ICOD. Without this, it is recognised that the business case for more resources is undermined.

To provide the best opportunity to allow CoLP to meet the ambition of achieving gold accreditation on the Inclusive Employers Standard within the next 3 years, it is asked that the following requests be considered for prioritisation to ICOD.

1. **Business Analyst** – Dedicated support from CPO to deliver a fast-time review of ICOD. This will specifically address gaps in knowledge and formalise the organisational understanding of how delivering cultural and behavioural change should be quantified and measured as part of the Business Planning Process. Moreover, following this review, benefit will be derived from the identification of gaps or areas for improvement; helping drive efficiencies and improve operational delivery. This will also inform future discussions about the optimum operating model for ICOD from an evidence-based perspective.
2. **Data Analyst** – Dedicated support to allow for more cross organisational data capture and analysis to build understanding of the organisational culture and areas of risk and assess effectiveness and impact using multiple data points. Additionally, this will allow for consistent reporting against various strands including Public Sector Equality Duty, national plans including VAWG and PRAP and multiple governance boards. It is recognised that this capability is being built as part of CoLP's Data Strategy, but more immediate support is requested.

Kate MacLeod, Head of Inclusivity, Culture and Organisational Development

Professionalism and Trust