# Equity, Diversity and Inclusion Strategic Board

EDI Data / Problem Statement Pack produced by Inclusivity, Culture and Organisational Development (ICOD) Team

'Our People' Commitment 2 Deep Dive, May 2025

Summary of Problem Statements

1) Under-representation of ethnic minorities within City of London Police, especially at Supervisory levels
2) Under-representation of female officers within City of London Police
3) Poor disclosure rates of protected characteristics for CoLP employees, in particular those self-declaring disabilities
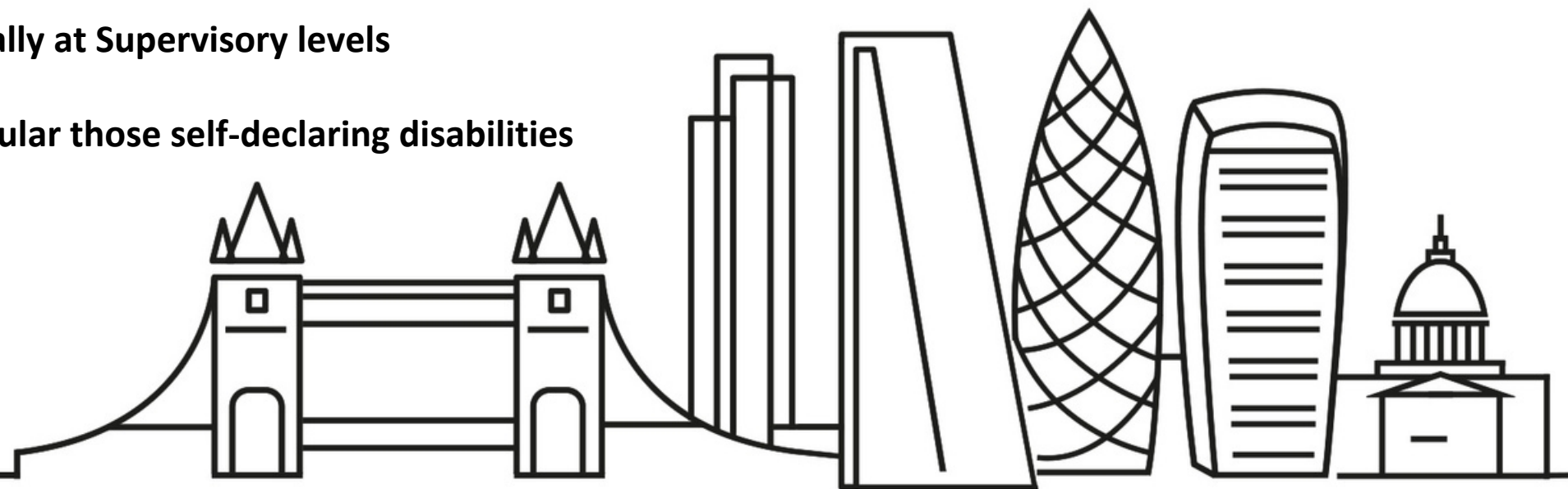
A local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion

Our People – Commitment 2
We will increase the diversity of under-represented talent from all backgrounds, at all levels across our service
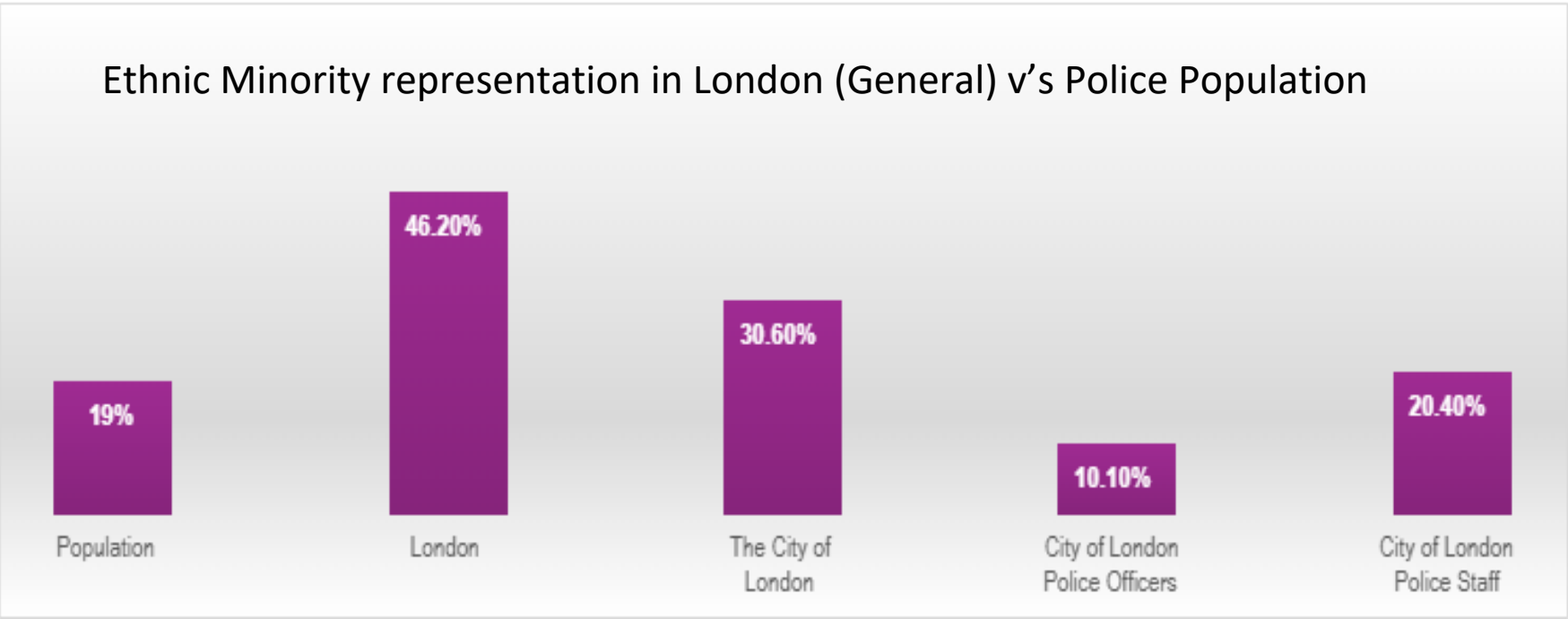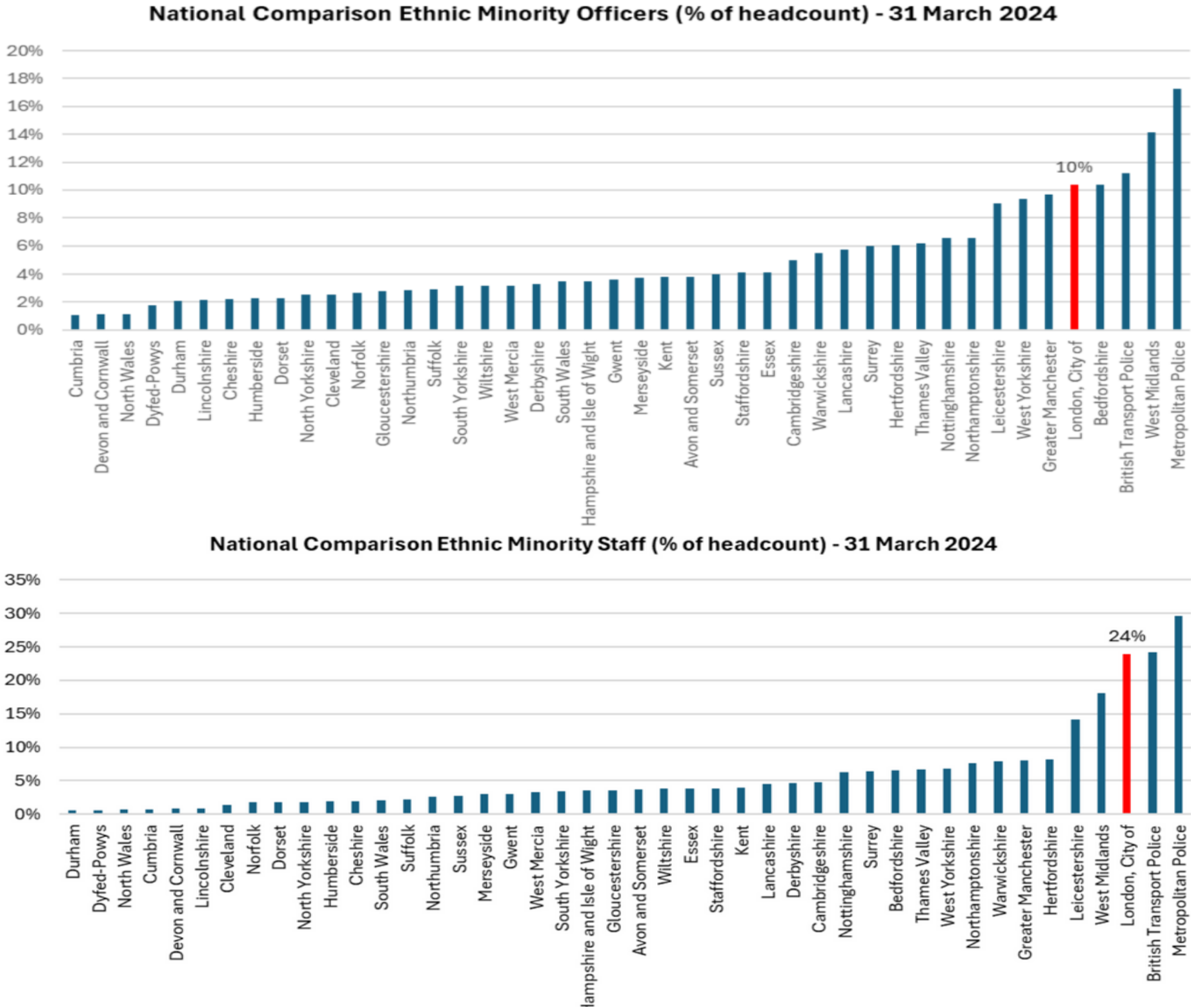
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Problem statement 1
Under-representation of ethnic minorities within CoLP, especially at Supervisory levels

Analysis

National Comparison Ethnic Minority Officers (% of headcount) - 31 March 2024

National Comparison Ethnic Minority Staff (% of headcount) - 31 March 2024

- Our overall representation of numbers of ethnic minority officers and staff in CoLP ranks well ie for Officers and Staff at 5th and 3rd National highest respectively, out of a total of 44 forces. For officers this equates to 10% of our workforce and for staff, this is 24%.
- Met Police is 1st placed across both Officers (17%) and Staff (29%).
- However, if we focus on London data, this does change the picture slightly- the population of City of London (total 8600) is made up of 30.6% ethnic minority and wider London higher at 46.2%. Note that for wider UK it is 19%*.

('Ethnic' in this instance incorporate black, Asian, mixed and 'other')*

Ethnic Minority representation in London (General) v's Police Population

Sources for all National data- Office National Statistics / Home Office Police Workforce 2023/24

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Analysis

The picture changes further still when we focus on CoLP data provided by HR and ethnic representation by rank / grade:-

- For officers, there are 103 in total representing ethnic minority backgrounds. Of these, 91 are at Constable level but only 7 at Sergeant, 2 at Insp, and 1 each at Chief Insp, Chief Supt and Cmdr (0 Supt).
- For staff, there are 152 in total representing ethnic minority backgrounds. Of these, 116 are at Grades A-D, 20 at Grade E and just 7 at Grades E+ and upwards.

Green = Anything above 30% EM as percentage of rank / grade.
Amber = 10-30% EM as percentage of officer rank, 20-30% EM as percentage of staff grade.
Red = Anything below 10% EM as percerntage of officer rank and below 20% EM as percentage of staff grade.

* 9.5% of staff and 13.4% of officers = ethnicity 'not stated'

Rank	Number Ethnic Minority	EM as percentage at this rank
Con	60	12%
Det Con	31	12%
Sgt	4	6%
Det Sgt	3	5%
Insp	2	11%
Det Insp	0	0%
Ch Insp	0	0%
Det Ch Insp	1	4%
Supt	0	0%
Det Supt	0	0%
Ch Supt	1	33%
Det Ch Supt	0	0%
Cmndr	1	100%
Dep Comm	0	0%
Comm	0	0%
Total	**103**	
Total Headcount 31/3/25	**1000**	
%	**10.3%**	

True Grade	Ethnic Minority	Ethinic Minority by percentage by grades
A.	1	33%
B.	7	35%
C.	54	30%
C/D	0	N/A
C+	1	17%
D.	53	26%
E.	29	18%
E+	1	17%
F.	5	14%
G.	1	6%
H.	0	0%
I./J.	0	0%
Total	**152**	
Total Headcount 31/3/25	**642**	
%	**24%**	

Decision

- To improve the level of ethnic minority representation within CoLP at all levels, but with special focus on our Supervisory ranks and grades.

Existing actions within EDI Strategy

Action Ref	Actions	Owner	Status
2.1	Write and deliver recruitment strategy	HR	In progress
2.2	Delivery and Evaluation of Positive Action Learning Scheme	ICOD	In progress
2.4	Delivery and Evaluation of Sponsorship Scheme	ICOD	In progress
2.7	Creation of Retention and Exiting Workgroup (with programme of work in place)	NLF	Completed
2.8	Delivery against statutory requirements (including PSED)	ICOD	In progress
2.10	Monitoring of recruitment, promotion and retention data	HR	In progress

3 Key Considerations / Recommendations

1) Evaluation of our existing programmes targeting under-represented groups (PALs, Sponsorship) to understand impact and outcome alongside National benchmarking of success stories.
2) Better understanding our data (application, recruitment, promotion, development, retention, exiting) to identify blockers and inform our recruitment strategy.
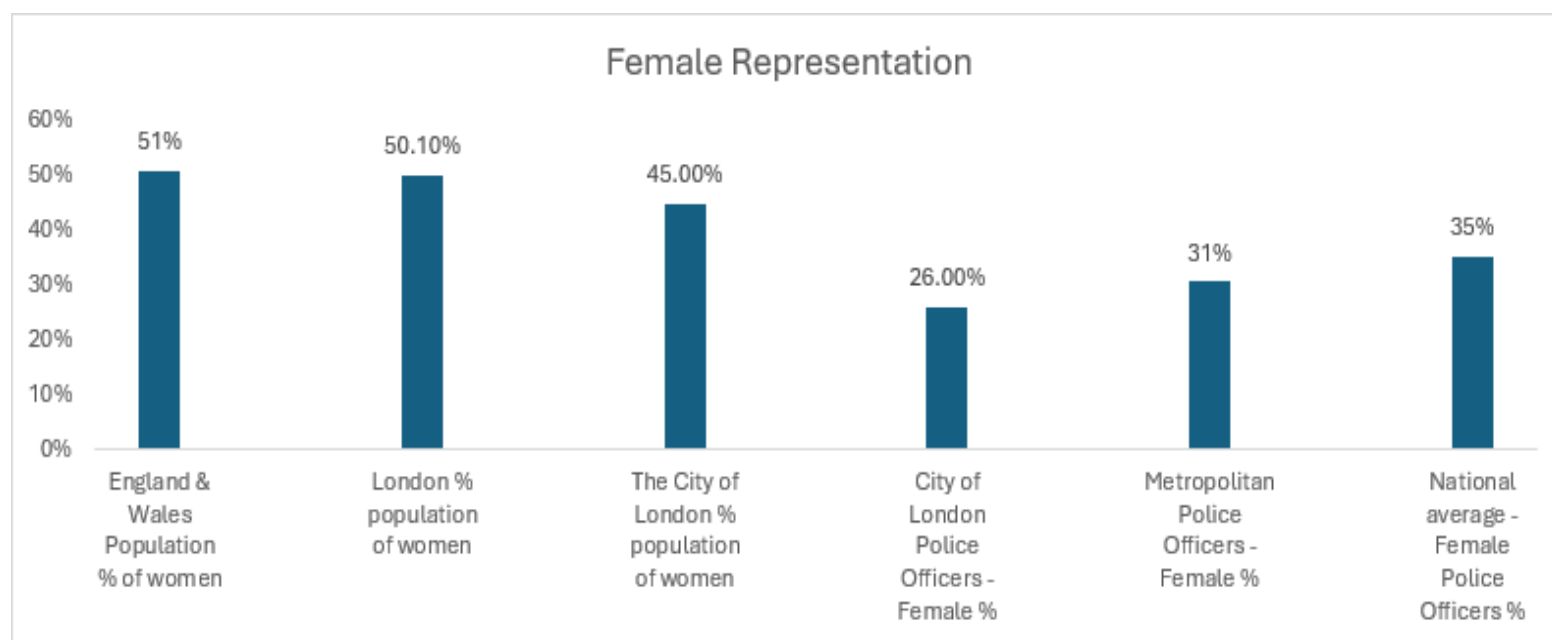3) Do we want to set any targets / milestones in relation to this thematic?

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We will increase the diversity of under-represented talent from all backgrounds, at all levels across our service

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Problem statement 2

Under-representation of Female Officers within City of London Police

Female Representation

Source above- Police workforce, England and Wales: 31 March 2024 - GOV.UK A New Met for London (2024)
Source right- Home Office Police Workforce data (March 2024)

Proportion of Female Officers Nationally March 2010 to 2024 (England and Wales)
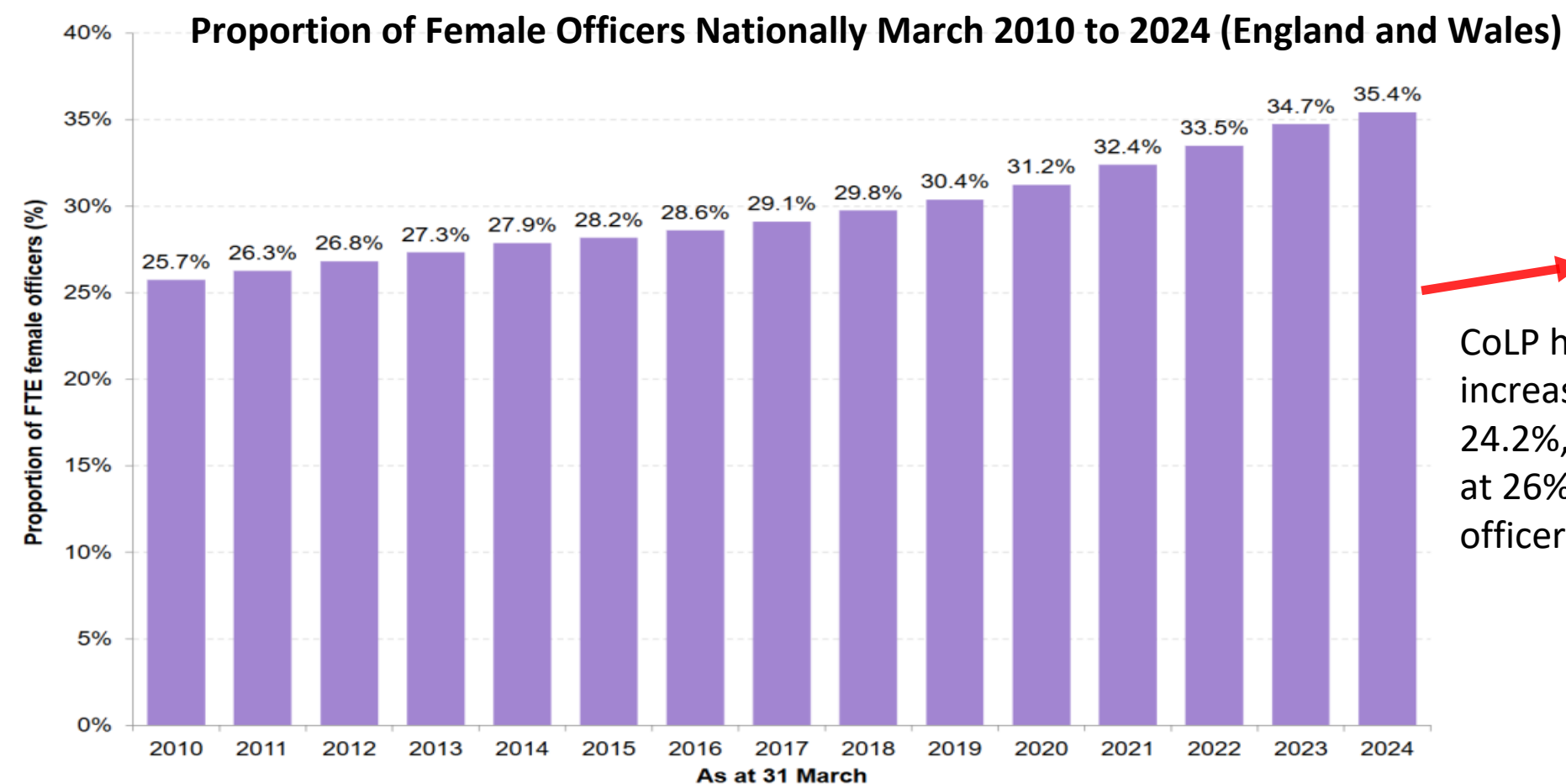
CoLP has seen an increase from 24.2%, currently at 26% of total officer workforce

Analysis

- With the UK general population being made up of 51% female and the City of London specifically 45%, we can see that City of London Police Officer representation is low across London at 26%. It is worth noting that for female staff representation we are in a much better place at 61%, far higher than the National force average.
- Home office data from March 2024 tells us that Cumbria had the highest proportion of female officers (42.6%) followed by North Wales (41.0%). The City of London Police had the smallest proportion of female officers (24.2%) followed by the MPS (31.3%) and Dorset Police (32.6%).
- We know that since then, our rates have continued to gradually improve and now sit at 26.00%. However, we are still far lower than the National average proportion of female officers across all 44 forces, at 35%. *NB- Met have also shared an increase and are now at 31%.*
- Analysis of the spread across rank and grade did not highlight any immediate areas of concern, with a number of the SLT identifying as female. However, further analysis would be required to look at specific promotion points and also representation across specialist posts.

Analysis

If we breakdown gender representation by rank and grade, there are very few areas of concern. On the contrary:-

- Our representation for female staff (394 in total) is above the national average for women in policing across all grades.
- At our Senior Officer ranks, female representation is very strong with 4 Supt, 3 Chief Supt and 1 Cmndr (there a few exceptions at higher ranks but these are not statistically significant).
- For all officers, there are 260 women in total. Of these, 197 are at Constable level (with strong numbers of female Detectives).
- We are however below National average at Insp and Chief Insp ranks which could be a future area of focus.

Green = Anything above 31% (notional average for women in policing)
Amber = 20-30% slightly below average of women in policing
Red = Anything below 20%

Grade/Rank	Female	% women by rank
Con	108	22%
Det Con	89	35%
Sgt	20	28%
Det Sgt	11	17%
Insp	5	26%
Det Insp	9	29%
Ch Insp	4	27%
Det Ch Insp	7	30%
Supt	1	33%
Det Supt	3	43%
Ch Supt	3	100%
Det Ch Supt	0	0%
Cmndr	1	50%
Dep Comm	0	0%
Comm	0	0%
Total	**260**	
Total headcount	**1000**	**26.0%**

Gender by Grade

Grade	Female	% of women by Grade
A.	3	100%
B.	14	70%
C.	117	66%
C+	3	50%
D.	122	60%
E.	97	60%
E+	5	83%
F.	15	42%
G.	13	72%
H.	4	33%
I./J.	1	33%
Total	**394**	
Total headcount	**644**	**61.0%**

Decision

- To improve the number of female officers within the City of London Police by focusing on recruitment, development, promotion and retention activity, to identify how we can recruit higher numbers (of students and transferees) and also address any barriers in relation to applications, career development and retention.

Existing actions within EDI Strategy

Action Ref	Actions	Team owner	Status
2.1	Creation and delivery of recruitment strategy	HR	In progress
2.7	Creation of Retention and Exiting Workgroup (with programme of work in place)	NLF	Completed
2.8	Delivery against statutory requirements (including PSED)	ICOD	In progress
2.10	Monitoring of recruitment, promotion and retention data	HR	In progress

3 Key Considerations / Recommendations

- Utilising a sound evidence base (including both quantitative and qualitative data) to improve understanding of barriers for progression within CoLP of our female officers and use this to inform future recruitment and development activity.
- Review processes in place to scrutinise and understand data and disproportionality, building our understanding of representation within specialist posts especially.
- Do we want to set targets / milestones for this thematic?

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Problem statement 3
Poor disclosure rates of protected characteristics for CoLP employees, in particular those self-declaring disabilities

Disclosures Rates of City of London Police Officers across all Protected Characteristics Comparison of 2023 and 2024 data

Legend: ● 31/12/2024 (%) ● 31/12/2023 (%)
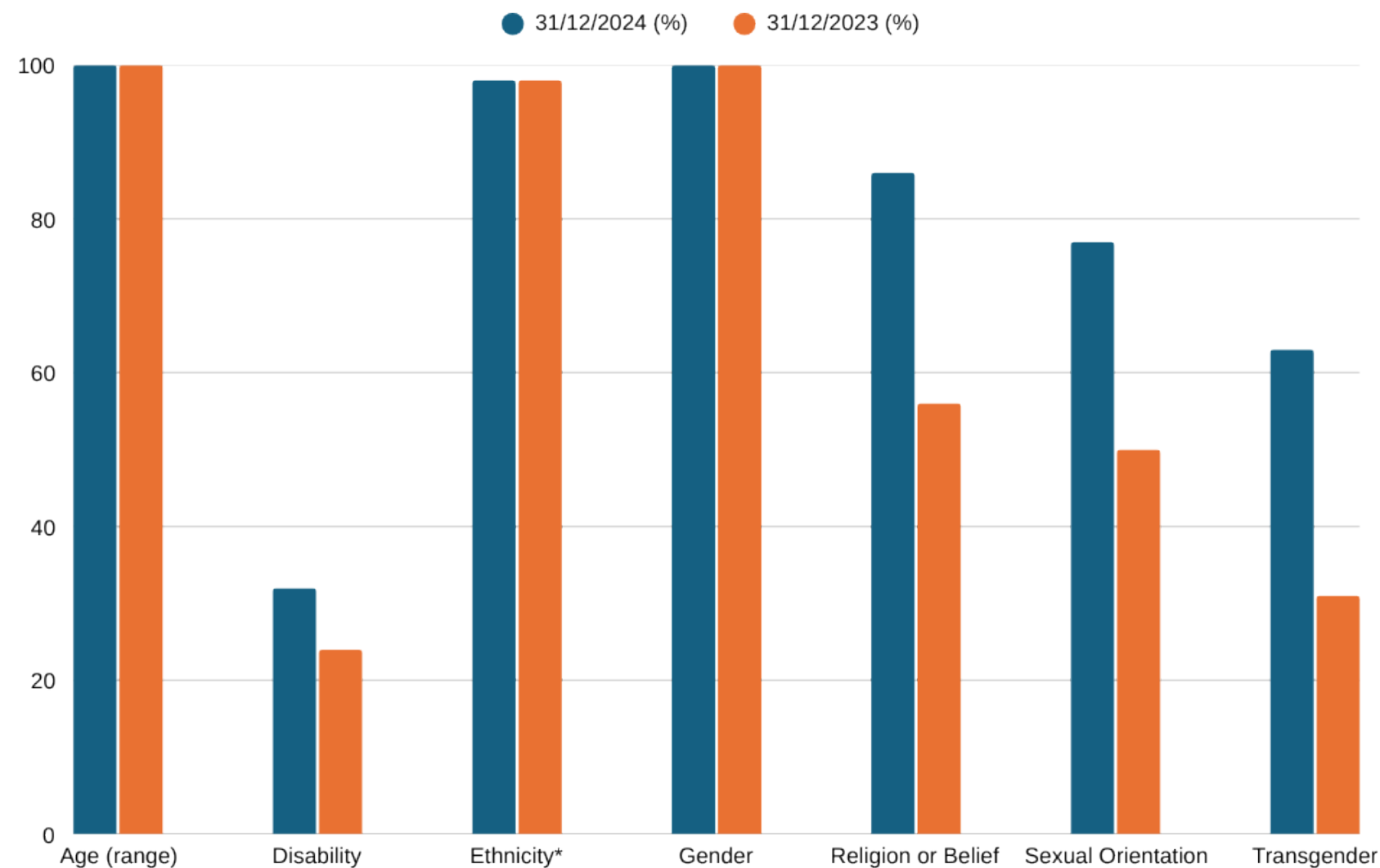
Analysis

This chart shows the disclosure rates of colleagues across the last two years, including data from year-ends 2023 and 2024. Of note:-

- Officers and Staff are encouraged to provide details of any protected characteristics at various points in their careers- including on application, on appointment, staff surveys and so on. As well as via specific data gathering exercises (such a prompts on Intranet from HR/Comms team).
- Of positive note, there has been an increase in self-declaration across all protected characteristics from 2023 to 2024 (apart from age range, ethnicity and gender which have remained the system).
- However, of concern is the level of self-declaration for disability. Whilst we recognised that there has been an increase of 8%, this is still considerably lower when compared with other categories.

When considering this problem statement, we should also note the National Picture- 10.2 million UK people of working age (16 to 64) reported that they were disabled in Dec 2023, which is 24% of the working population and an increase of 0.5 million from the year before*.

*Source- DWP Family Resources Survey 2023

Problem statement 3 Continued

Poor disclosure rates of protected characteristics of CoLP officers and Staff, in particular those self-declaring disabilities

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Decision

- To improve the levels of self-declaration of protected characteristics from our colleagues, especially those with disabilities.

Existing actions within EDI Strategy

Action Ref	Actions	Team owner	Status
2.8	Delivery against statutory requirements (including PSED)	ICOD	In progress
2.9	Ensure ability to update diversity data for all staff	COMMS	In progress
2.1	Monitoring of recruitment, promotion and retention data	HR	In progress
2.12	Plan created to address poor disclosure rates relating to protected characteristics	ICOD /Cmdr Shaw	In progress

3 Key Considerations / Recommendations

- Working with key stakeholders, including Disability Enabling Network (DEN) and members, build upon our understanding of why there is low declaration for this protected characteristic and what we can do to address this ie do colleagues understand the benefits in disclosing, are there additional layers relating to intersectionality?
- Is the process of updating personal data simple to do, can we encourage this at different points in the calendar year and is the wording of any questions around this fit for purpose?
- Do we want to set targets / milestones in relation to this thematic?

END