INDEPENDENT SCRUTINY & OVERSIGHT BOARD

Five Years of Independent Scrutiny of The Police Race Action Plan:

# Independent Scrutiny & Oversight Board Final Report

*March 2026*

# About the Independent Scrutiny & Oversight Board (ISOB)

**The Independent Scrutiny & Oversight Board (ISOB) exists to oversee and provide external scrutiny of the Police Race Action Plan. The focus of the Plan is on the experiences and concerns of Black people due to the starkness of the racial disparities present in policing's interactions with Black communities.**

## Abimbola Johnson, Chair & WS2

Abimbola Johnson is an award-winning human rights barrister who practises from Doughty Street Chambers. She was called to the Bar by the Inner Temple in 2011. Abimbola is also a legal commentator and writer. She has been featured in *The Guardian*, *Elle magazine*, *Bloomberg*, *Thomson Reuters*, *Channel 4 News*, *The Metro*, and *Sky News*. Her writing appears on the reading list for the LSE's LLB (Hons) course.

Abimbola sits on a number of boards and advisory panels: She is a legal trustee for The Advocacy Academy; an editorial board member for the Criminal Law Review; a management committee member of the Black Barristers' Network, and a member of the advisory board for The Howard League's project "Making Sure Black Lives Matter in the Courtroom."

Abimbola graduated from the St Peter's College, University of Oxford with a degree in Law (Jurisprudence) in 2009. Abimbola chairs the ISOB and has specific scrutiny over workstream 2, use of powers.

## Colin Douglas,  WS1; WS3

Strategic communications and marketing specialist. Colin's clients have included the Equality and Human Rights Commission, Financial Ombudsman Service, Charity Commission and the Government Commercial Function based in the Cabinet Office.

## Nick Glynn, WS2

Commentator, activist and independent policy consultant, specialising in policing, criminal justice, anti-racism and drug policy reform, working across Western Europe. Previously led Police reform portfolio as a grantmaker at Open Society Foundations.

## Katrina Ffrench, WS3; WS4

Founding director of UNJUST C.I.C. Katrina is on a mission to address discriminatory practices and policies, UNJUST is focused on reimagining policing and the criminal legal system, promoting public safety and empowering the public to be agents of change.

## Racheal Grant, Data & Evidence; WS4

A data scientist who has worked in the industry for the last nine years, predominantly within the public sector, supporting the Home Office, The Ministry of Defence and the Ministry of Justice, reporting and advising on sensitive high security data.

## Ram Joshi, Data & Evidence; WS1, WS2

Experienced policy professional with an excellent track record of leading the delivery of public policy initiatives. Ram is a senior leader in the Civil Service, and also has experience of working in financial services regulation.

# Foreword

## Abimbola Johnson, Chair of the Independent Scrutiny & Oversight Board

Five years is a long time in policing. In those five years, the Independent Scrutiny & Oversight Board (ISOB) has sat across the table from policing leadership, read thousands of pages of action plans, challenge papers and progress reports, visited communities across the country, and asked the same question in more ways than can be counted: is policing genuinely getting better for Black people?

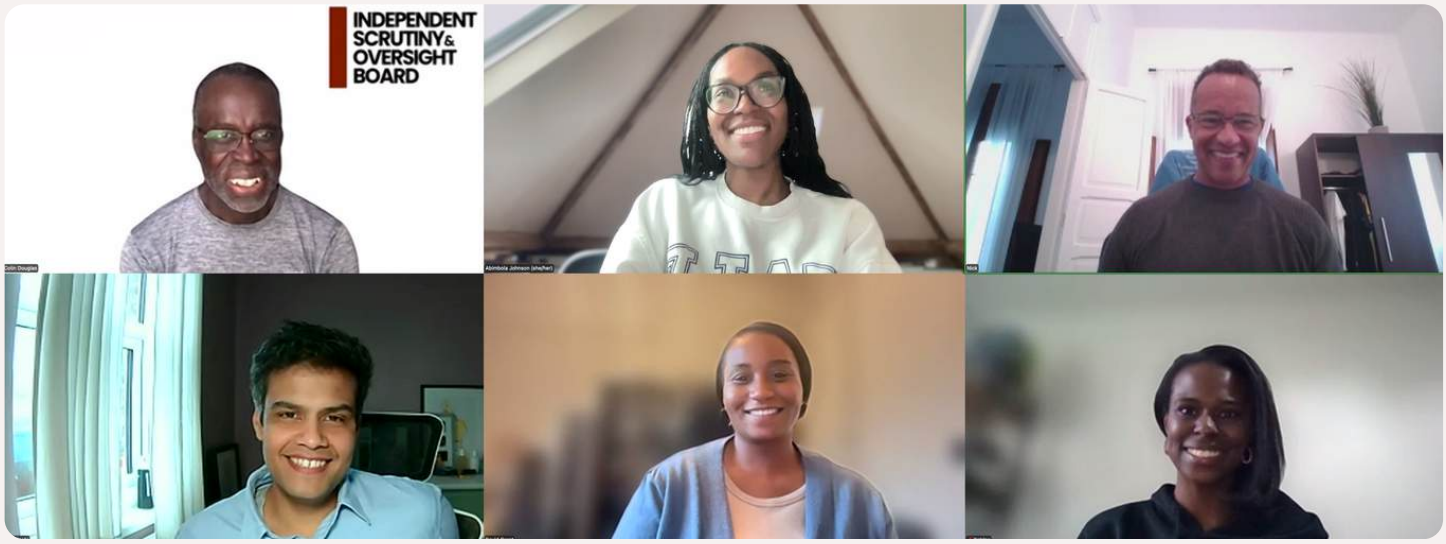
When I was appointed to this role in 2021 - and as I wrote in *The Guardian* at the time - friends warned me I would be hard-blocked at every turn, worn down by frustration, or have no real power, if not all three. I remained acutely sensitive to that cynicism throughout. What follows is the honest account of what five years of independent scrutiny actually produced.

The honest answer, at the end of those five years, is: not enough, not fast enough, and not in the ways that matter most to the communities this work was created to serve.

That is not a counsel of despair. Progress has been made. Conversations that were once dismissed as peripheral to "real" policing are now at least taking place. Forces that once had no language for institutional racism have begun to grapple with what that phrase actually means. A maturity framework now exists that, if developed properly, would enable the public, for the first time, to hold forces to specific, measurable commitments rather than vague aspirations.

These are real achievements, and they should be recognised. However, the nature of that progress has often been incremental and piecemeal rather than systemic. This has, at times, constrained the depth and pace of our scrutiny. Too often, we have found ourselves returning to foundational questions: have communities been meaningfully engaged; has relevant expertise been brought into the design of this work; and where is the evidence that a given action contributes to an anti-racist outcome? These are not advanced questions of scrutiny. They are basic tests of whether change is being approached with sufficient rigour.

The ISOB was established to do more than note progress. It was established to ask whether that progress is real, whether it is reaching the communities it was intended to serve, and whether the systems and structures around policing will sustain it beyond the lives of particular programmes or individuals. On those questions, the evidence gathered over five years shows that the foundations




remain fragile. It is a matter of concern that, at the conclusion of this Programme, we are not yet able to say with confidence that the professional curiosity, analytical depth, and shared understanding required for more mature scrutiny are consistently embedded across policing.

This final report is not a verdict. It is a record and a resource. It draws on five years of the Board's own scrutiny and on 36 interviews conducted in early 2026 with a wide range of people who have engaged with policing on anti-racism from many different vantage points. Its purpose is to distil that experience into something useful: a practical guide to what works, what does not, and what any individual or organisation engaging with policing on these issues needs to know before they begin.

The work does not end here. The Police Race Action Plan may be transitioning, and the national ISOB may be concluding its formal mandate, but the conditions that made this work necessary have not changed. Black communities continue to experience policing differently. The data continues to show disproportionality at almost every point of contact. The structural barriers to change remain largely intact.

The ISOB leaves behind a body of evidence, a set of findings, and a framework. What happens with those is now a question for policing, government, civil society, and for the communities whose trust policing has spent decades saying it's trying to rebuild.

This report is offered in the hope that it helps to answer that question more effectively than the last five years have managed.

To Colin, Katrina, Michelle, Nick, Racheal, Ram and Viya. Thank you. For your incredible, diligent work, your dedication to anti-racism and your support. As a board, we have been through a lot: the birth of children, the loss of family, and even battling cancer. Working with you all has been a pleasure and a privilege. Thank you for the huge personal investment you have put into our scrutiny work.

I also wish to acknowledge the work of Gavin, Ali, the PRAP Central Team, past and present, and the National Black Police Association. Your work should not be understated. In environments that have at times been difficult and wearing, your continued commitment has helped to sustain this work when it might otherwise have stalled.

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# Executive Summary

## What five years of scrutiny have taught us

In July 2020, following the global reckoning prompted by the murder of George Floyd in the United States and the sustained energy of the Black Lives Matter movement, policing in England and Wales made a public commitment to change. The Police Race Action Plan (PRAP) was established under the joint leadership of the National Police Chiefs' Council and the College of Policing, with the stated aim of making policing better for Black people, whether as members of the public or as officers and staff working within the service.

At the same time, the Independent Scrutiny & Oversight Board (ISOB) was established in 2021 to hold that commitment to account. Independently chaired, externally constituted, and drawing on the expertise of people with deep experience in race equity, law, community engagement and public accountability, the ISOB has spent five years asking whether the promises policing made are being kept.

**This final report is the culmination of that work.**

It draws on five years of annual scrutiny reports, on the ISOB's sustained engagement with the PRAP team, with policing leadership at national and local levels, and on 36 in-depth interviews conducted in early 2026 with a wide range of people who have engaged with policing on anti-racism from different perspectives.

## The headline findings

**The evidence tells a consistent story.** Progress has been made, but it has been uneven and fragile. It is far too dependent on individual goodwill rather than structural accountability. The voluntary nature of the PRAP has been both its strength and its central weakness: it enabled a degree of honest self-reflection that a compliance-driven approach might not produce. However, it also allowed forces to disengage without consequence, therefore, progress could be undone by changes in leadership or a shift in organisational priorities.

**Eight themes emerged consistently across all 36 interviews, and across five years of the ISOB's own scrutiny work:**

Leadership commitment is the single most cited driver of progress. Where senior leaders are genuinely and visibly committed, things change. Where that commitment is absent or transient, they do not.

The gap between aspiration and measurable outcomes has been persistent. Policing has been better at producing action plans than at demonstrating their impact.

Trust between Black communities and policing remains too low and cannot be rebuilt through communications or goodwill gestures alone. It requires changed behaviour by the police, sustained over time.

Performative engagement and consultation have too often substituted genuine structural change.

Internal police culture is the most significant barrier to progress. An external framework is incapable of overcoming a culture that does not want to change.

The absence of statutory accountability is the structural gap that undermines everything else. Without legal duties, enforceable standards and independent inspection, progress depends entirely on goodwill, leading to the PRAP inevitably being de-prioritised and treated as an 'add-on'.

Racism within policing is structural and systemic, not simply the product of individual prejudice. Frameworks that treat it as an individual behaviour problem are inadequate.

Intersectionality remains a significant and under-addressed gap. Race does not operate in isolation, and approaches that treat it as if it does will miss the people experiencing the greatest harm.


## What this report offers

The PRAP is transitioning, which means the national ISOB is concluding its formal mandate. However, as the work is far from finished, this report is offered as a foundation to whoever takes it forward.

This report is intended to be useful to everyone who engages with policing on anti-racism: community organisations, civil society groups, independent scrutiny bodies (national and regional), policing professionals working on race equity from the inside, academics and researchers, journalists, and policymakers.

It is written to be accessible regardless of how much prior knowledge of policing or race equity work a reader brings.

It closes with recommendations for each part of the system with a role to play in the years ahead.

The report is accompanied by a separate partner guide, A *Practical Framework for Engagement*, drawing on the direct experience of those who have done this work. It sets out what to expect, what to watch out for, and the conditions that either enable progress or make it more difficult.

## How to read this report

**This report is structured in two parts:**

**1.**

**The first examines the PRAP and the ISOB: what was built, what was attempted, what worked, what did not, and what the evidence shows about why.**

**2.**

**The second places the PRAP's five years in the broader context of what this work requires and what still obstructs it.**

## Methodology

**This research draws on 36 in-depth interviews conducted with a range of individuals with direct experience of, or expertise in, policing, anti-racism, and the criminal justice system in England and Wales.**

The interviewees represent a wide range of perspectives. These include ISOB board members at the national and regional levels; the PRAP programme staff; community leaders; civil society organisations; retired and current police officers and staff; academic experts; journalists; and policing professionals working on race equity from within the system. Their experiences span force areas across England and Wales, from dense urban areas to predominantly rural landscapes. Collectively, participants brought experience spanning more than four decades, providing both historical perspective and contemporary insight.

Interviews were conducted via video call between February and March 2026, and followed a semi-structured format, allowing for consistency across conversations while giving participants the flexibility to speak to their own areas of knowledge and experience.

All participants are quoted and referenced anonymously throughout this report, in order to encourage candour and to protect the identities of those who may still be in active professional roles.

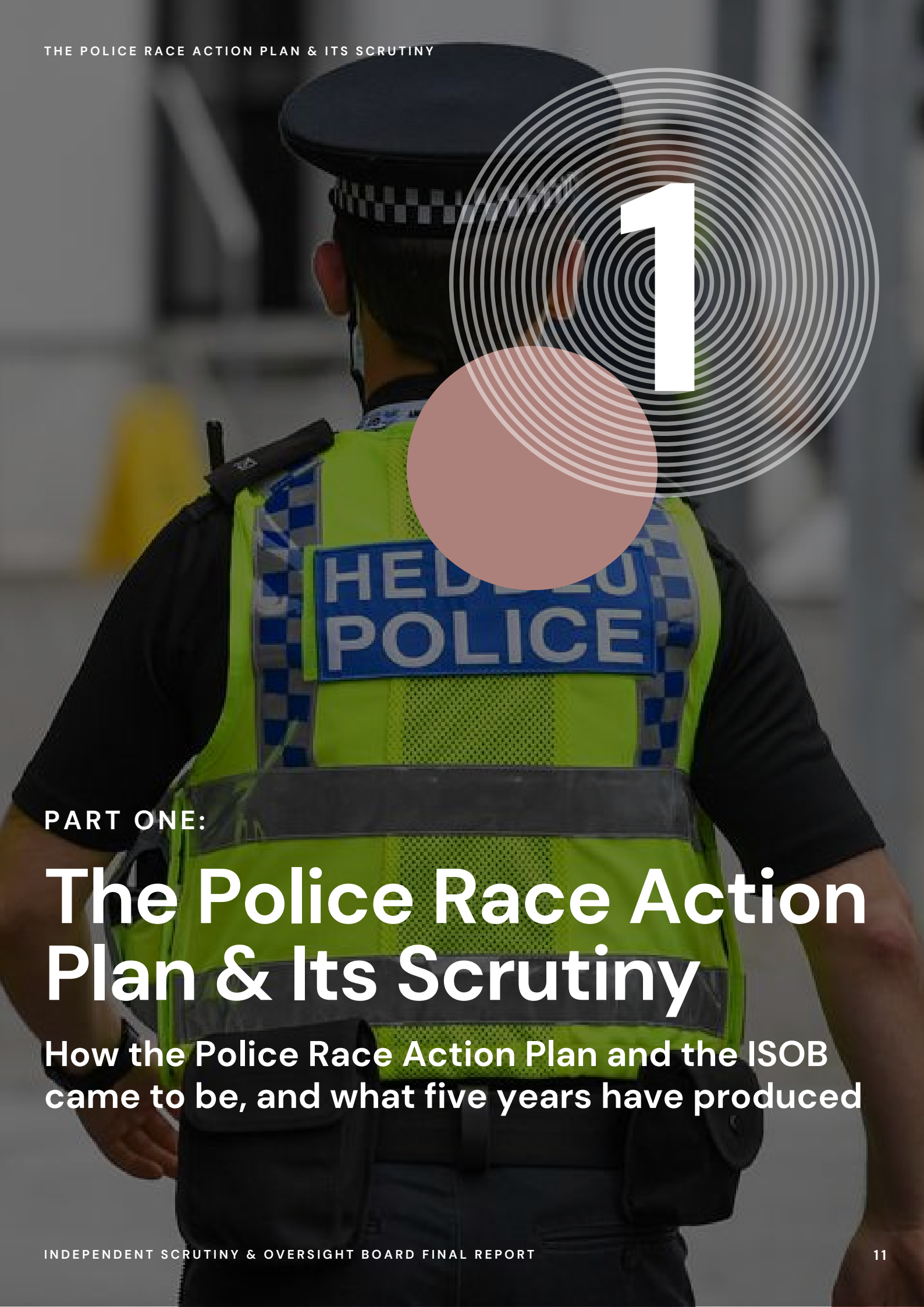
The primary research was supplemented by desk research and document analysis, including five years of ISOB oversight documentation.

## Acknowledgements

We would like to express our appreciation to all the individuals and organisations that have contributed to this research project. Each was open and transparent with their experiences of engaging with the police on race equity and anti-racism matters.

**In addition, we are grateful to the following individuals and organisations that have provided insights into our reports over the years:**

- The Anthony Walker Foundation
- Criminal Justice Alliance
- Crest Advisory
- Desmond Brown
- Missing Black People
- The National Black Police Association
- Revolving Doors
- The Runnymede Trust
- Sarah Crew, Chief Constable, Avon and Somerset Police

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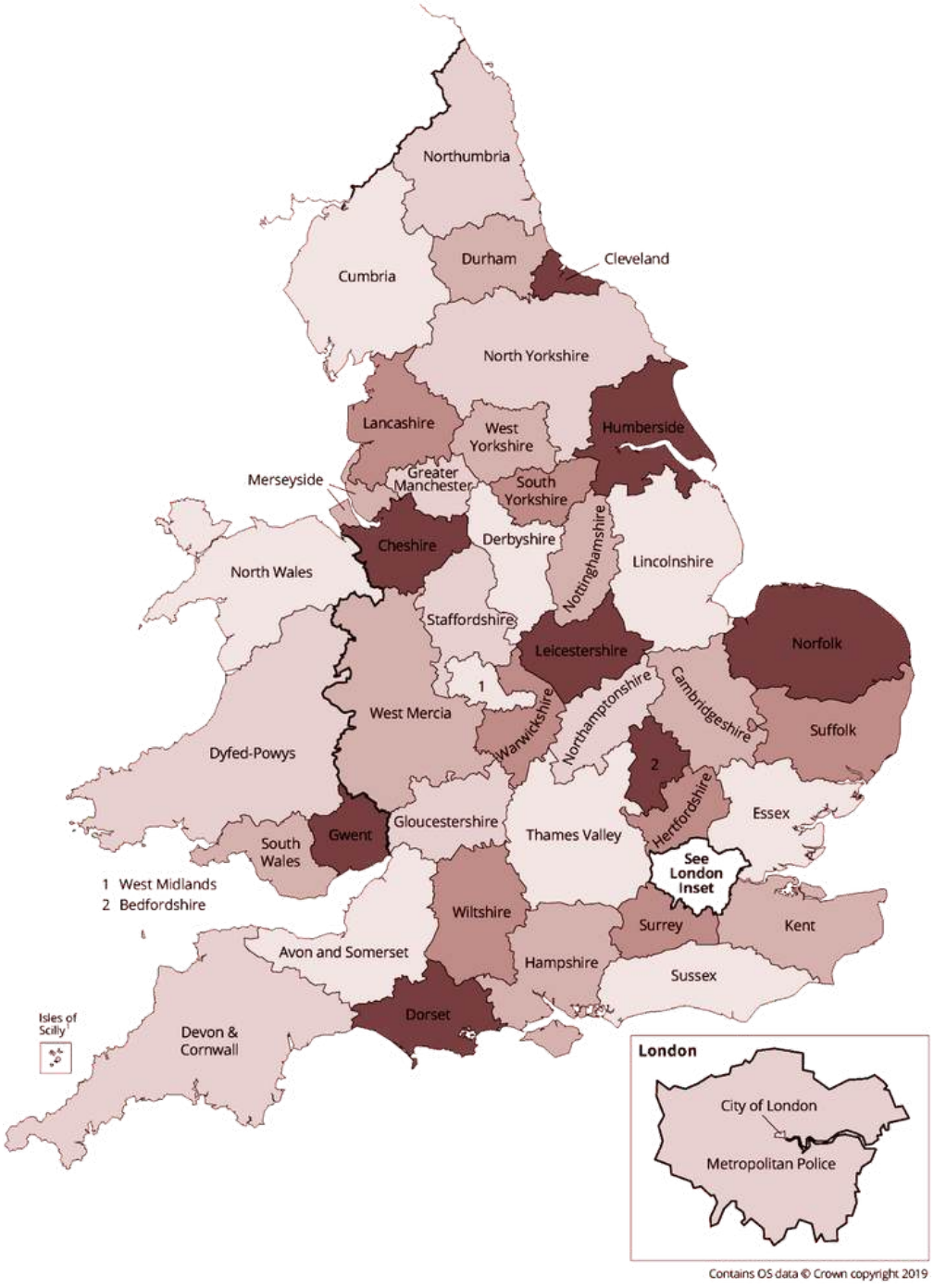
PART ONE:

# The Police Race Action Plan & Its Scrutiny

## How the Police Race Action Plan and the ISOB came to be, and what five years have produced

# Police Forces in England & Wales

**There are 43 territorial police forces and three special forces in England and Wales. The Police Race Action Plan covers all 43 forces, plus the British Transport Police.**




# Background & Context

## Why this work began

On 25 May 2020, George Floyd, a 46-year-old Black American man, died in Minneapolis after a police officer knelt on his neck for more than nine minutes. The video of his murder was seen around the world. Within weeks, millions of people had taken to the streets in cities across the United States, the UK and beyond, in the largest mobilisation for racial justice in a generation.

In the UK, the Black Lives Matter movement brought renewed attention to questions about policing that communities had been raising for decades. The disproportionate use of stop and search powers against Black people. The deaths of Black men and women in police custody. The persistent underrepresentation of Black officers in senior roles, and the experiences of discrimination reported by those who had made it in. These longstanding concerns highlighted the gap between what policing said about itself and what Black communities experienced on the ground.

UK policing had faced these questions before. In 1999, the Stephen Lawrence Inquiry Report, also known as the Macpherson Report, following the murder of Stephen Lawrence, named the Metropolitan Police as institutionally racist. Recommendations followed, commitments had been given, but progress had been limited. More than twenty years later, many of the same issues remained. Almost 20 years before this report, Lord Scarman had reported on the failings of policing in the lead-up to the Brixton disturbances of 1981.

In 2021, against this backdrop, the National Police Chiefs' Council (NPCC) and the College of Policing jointly established the Police Race Action Plan (PRAP). It was an ambitious undertaking: a national programme covering all 43 forces in England and Wales, plus the British Transport Police, with the explicit aim of making policing better for Black people.

Alongside the PRAP, and independent of it, the Independent Scrutiny & Oversight Board (ISOB) was established. Its mandate was to hold PRAP's delivery to account: to scrutinise the evidence, to challenge the narrative, and to maintain an honest record of what was and was not being achieved. The ISOB has done that work for five years, through four annual reports and sustained engagement with police leadership. This final report is both a closing of that account and an opening of the next chapter.

## What the Police Race Action Plan set out to do

The PRAP was organised around four workstreams, each designed to address a specific dimension of the relationship between policing and Black communities.

- **The first workstream addressed culture within policing.** This included examining the experience of Black officers and staff inside the service: the discrimination, disproportionality in misconduct procedures, the barriers to progression, and the feeling, described by many, of having to work twice as hard to be valued as half as good as white peers. It also addressed the behaviours and attitudes that shape how policing treats the public.

- **The second workstream focused on policing powers and how they are used.** This included stop and search, use of force, and the disproportionate impact of these powers on Black people. It was perhaps the most visible and most contested area of the PRAP, touching directly on the everyday experience of Black people in their interactions with police on the street.

- **The third workstream covered community engagement:** how policing builds relationships with Black communities, how it listens to them, and how it earns their trust. This was, in many ways, the most complex workstream, because trust is not something policing can declare or manufacture. It is something that has to be built, slowly, through sustained changed behaviour.

- **The fourth workstream focused on victim services: how policing responds when Black people are the victims of crime.** This included questions of empathy, responsiveness, adultification, and whether Black victims receive the same quality of service as white victims. The example of a Black child going missing, and whether that child's family received the same care and attention as a white family, was raised by multiple contributors to this report as a powerful illustration of what this workstream was trying to address.

At its best, the central objective was simple and clear: **everything within the PRAP existed to make policing better for Black people, whether as members of the public or as officers and staff.**

The ambition was not merely to reduce the harm that policing causes, but to build something better in its place: an anti-racist police service that Black communities could trust.

## Areas of good work

Throughout the PRAP, some conditions for meaningful change were established, as demonstrated by the work highlighted in this section. While this does not represent the complete solution, these areas provide a foundation for lasting progress.

In some cases, tools and structures now exist that did not before. While some of these achievements have yet to go as far as they must, all of them have demonstrated that it is possible to create space in policing for anti-racism work.

> ***"When you're operating in a sea of injustice, making three or four waves, even if you haven't had a tsunami, is important. Because we haven't had a tsunami, people say it hasn't been successful. That's not the case."***
>
> Senior stakeholder within policing

## Improved communication

When PRAP was first launched in 2021, there was very little public information available about the programme or its activities. As a result, the ISOB often appeared to be the only visible public-facing element of PRAP. This created confusion during early engagement with communities and stakeholders, many of whom assumed that the ISOB had authored the Race Action Plan itself. A significant amount of the Board's time was therefore spent explaining the origins and structure of PRAP before it could begin gathering insights, engaging with communities and experts, or setting out our scrutiny and recommendations.

Over time, this has improved. The PRAP central team and regional teams have demonstrated a greater willingness to share information publicly about the programme's work and progress. Updates on delivery have become more regular, and those responsible for implementation have increasingly engaged directly with external audiences to present their work and to receive feedback.

While these updates are not yet consistent in their depth, reflection, or evaluative detail, this shift toward more regular communication represents a meaningful change in ways of working. Policing has historically been cautious about publicly discussing ongoing or incomplete work, and the increased willingness to communicate more frequently about PRAP's activities is a positive development that deserves recognition.

## Research Bank

The ISOB expressed concern that learning generated through PRAP risked being lost over time. Policing has historically struggled with institutional memory, and in the early years of PRAP, the Board was struck by the extent to which forces reported a lack of accessible evidence, learning, and insight from previous work on race and policing.

This limited the Programme's ability to build on prior initiatives and, in some cases, required work to be developed without a clear evidential foundation.

To its credit, PRAP's partnership with the College of Policing has led to the development of a growing body of research and evidence that begins to address this gap. This includes evidence summaries on topics such as trauma, reconciliation and restorative practice in policing; adultification and adultification bias; and approaches to understanding and addressing ethnic disproportionality in stop and search.

Alongside this, a number of exploratory research projects have been undertaken, including the TASERD programme on social, ethnic and racial disparities in taser usage by police; findings from the *Our Black Workforce* survey, capturing the experiences of Black and Black Heritage police officers and staff; research on the unintended consequences of police contact for young people; and work examining the role of independent advisory groups and scrutiny panels. Evaluations have also been conducted on initiatives such as the Professional Conversations inter-ethnic peer networking scheme and scenario-based conflict management training.

Further research and evaluation are ongoing, including work on inclusive leadership, AI-enhanced supervision of stop and search, the impact of stop and search on young people's outcomes, and wider workforce and public confidence surveys.

Importantly, this body of work is publicly available. Taken together, it represents a meaningful step towards strengthening policing's evidence base and creates a foundation on which future programmes can build, reducing the risk that learning is lost and improving the sector's ability to deliver sustained progress on race equality. It also means that this work can be scrutinised in future and lessons learned from it.

> ***"Given the nature of policing, leaders retire after 30 years of service, so they last four or five years at most in the top leadership positions, and then they're replaced by someone who comes in and says, 'Oh, wouldn't it be a good idea if we did an EDI strategy, as if no one had thought of that before. And it's not just in this area; it's throughout lots of different things in policing. I remember interviewing a national lead (for a different portfolio) in 2017 or 2018 about their work, and he seemed to know absolutely nothing about what had gone before in that portfolio."***
>
> Policing correspondent

## Missing People: Progress through evidence and partnership:

**One of the areas where real cultural shifts can be observed over the life of the PRAP is in the policing response to missing people. What began with defensiveness, with early findings of disproportionality by the national charity Missing People in 2019 dismissed as "just a few people's experience", was eventually met with genuine engagement from the PRAP within Workstream 4.**

Research from Missing People and partners, including the community interest group Missing Black People, found that people from minority ethnic groups were missing for longer, were less likely to be found by the police, and were less likely to be recorded as being at risk than white people.

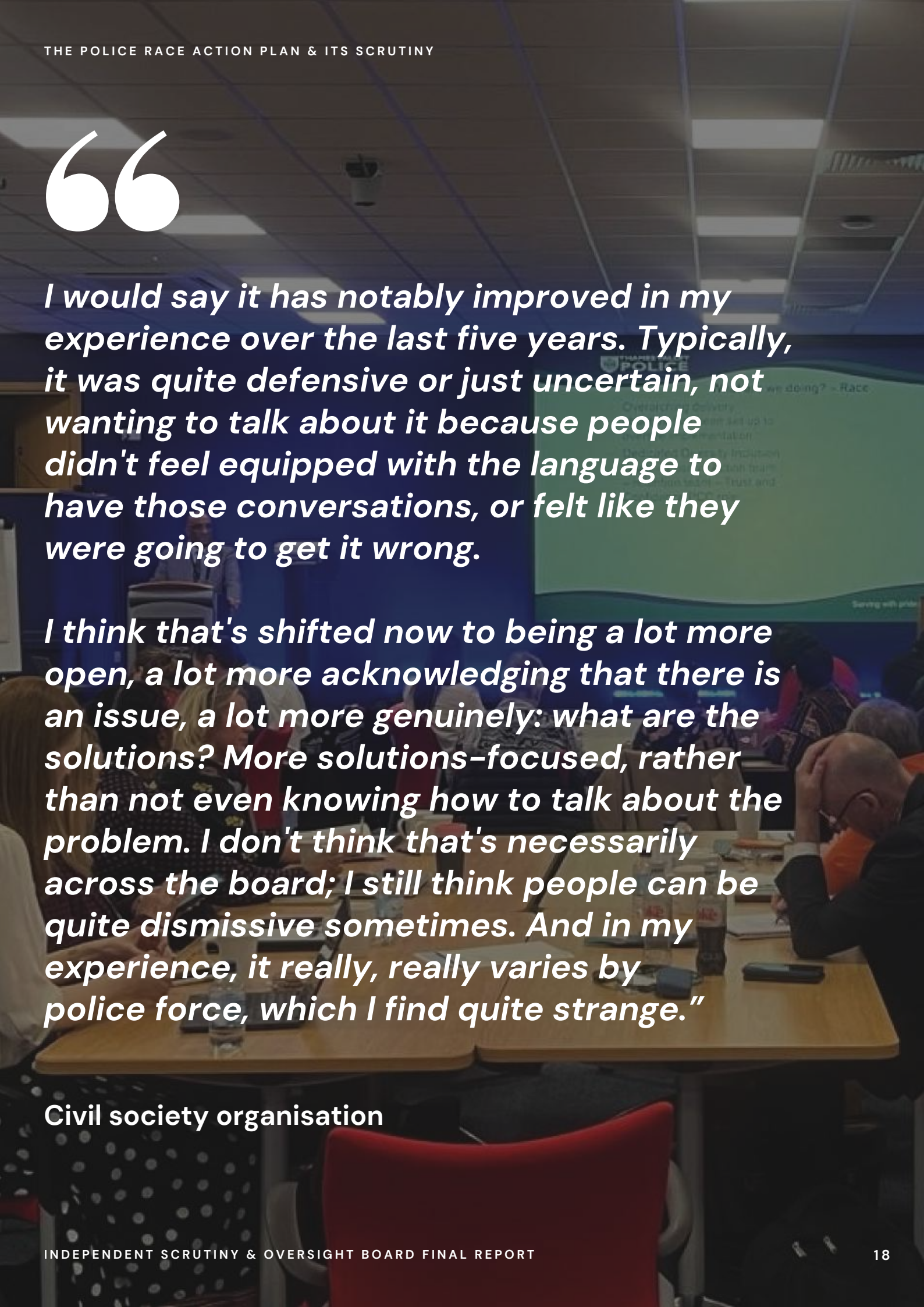
A lower proportion of missing incidents involving Black children were resolved by the police finding the child, at 16%, compared with 19% for Asian children and 23% for white children.[1] Missing People and their partners developed a practical toolkit for police forces on improving their response.

Interviewees spoke positively about a PRAP-hosted webinar in which people with experience of going missing could share their stories, including anonymously via voice notes, without the expectation of appearing on camera before a room full of police officers.

Critically, the event was designed with a clear principle: there would be no questions, no chat function, no opportunity for officers to challenge the experiences being shared.

Embedded in the session was the understanding that participants might be sharing their story for the first time, and having that met with immediate pushback or problematic responses could have caused real harm and set the work back significantly. The police were there to listen, not to respond.

That framing - centring the wellbeing of those with lived experience rather than the convenience or comfort of the institution - was itself a meaningful departure from how such events often run. Following the event, the PRAP team formally documented the findings and shared the information with participants. Despite a delay in getting the write-up to participants, the follow-through was important.



*I would say it has notably improved in my experience over the last five years. Typically, it was quite defensive or just uncertain, not wanting to talk about it because people didn't feel equipped with the language to have those conversations, or felt like they were going to get it wrong.*

*I think that's shifted now to being a lot more open, a lot more acknowledging that there is an issue, a lot more genuinely: what are the solutions? More solutions-focused, rather than not even knowing how to talk about the problem. I don't think that's necessarily across the board; I still think people can be quite dismissive sometimes. And in my experience, it really, really varies by police force, which I find quite strange."*

**Civil society organisation**

## Development of the Police Anti-Racism Commitment

Another example of genuine engagement was the development of the Police Anti-Racism Commitment, which grew out of the outcomes framework in the first version of the Police Race Action Plan.[2] There was a recognition by the PRAP team that in order to create a plan with anti-racism at its core, the desired outcomes needed to be refocussed and developed in partnership with anti-racism experts, whilst taking into account the experiences and priorities outlined by communities. In 2024, a consultation on the outcomes framework gained renewed energy when civil society organisations were convened by the PRAP central team and engaged with in a manner distinctive from policing's usual practice. The organisations and experts were provided with background material on PRAP and the outcomes framework, and were canvassed about the anti-racist priorities that should be prioritised. The College of Policing took away the feedback and redrafted the documentation. Sessions were held both in person at a non-police venue and remotely, materials were provided in advance, and summaries were provided after each session, allowing participants time to contribute meaningfully. The consultation was not perfect, at times the material shared was overwhelming, and the timescales unrealistic. Resourcing was a repeated issue in terms of the ask of civil society. Boundaries had to be drawn and reset.

The Anti-Racism Commitment now clearly defines the aims of anti-racism work in policing and aims to remain a lasting, evolving standard. It reflects the value of meaningful consultation and demonstrates what can be achieved when engagement is valued with actual influence rather than a formality.

## The Maturity Matrix

Building on the outcomes outlined in the Anti-Racism Commitment, the Maturity Matrix was developed during the penultimate year of the programme.[3] It represents the first serious attempt to build a framework for measuring anti-racist progress across forces in England and Wales. A central weakness in PRAP was that policing's delivery was being measured against whether it had completed a list of actions, rather than by whether those actions were actually changing outcomes for Black people. The Matrix gives that argument a practical form, and as a conceptual shift, it is significant.

However, it is not finished work. The most fundamental gap in the Maturity Matrix is the absence of community voice in its development. This is despite a specific ISOB recommendation in our 2025 Report to do precisely that. Sessions that have taken place since the development of the Anti-Racism Commitment have focused almost entirely on internal police groups. The community consultation that would have made the Maturity Matrix genuinely credible and useful has not yet happened, and at the time of writing this report, only high-level draft

standards and measures have been published. Communities have therefore not provided meaningful input into whether the Matrix is workable for them, or even whether its mechanisms appropriately meet the Commitment that they were consulted upon. The Maturity Matrix needs to be a co-designed tool, specifically given concerns in Black communities that policing is frequently done "to them" rather than "with them."

That is not a reason to abandon it. There is still time to address the consultation deficit before the Maturity Matrix is more widely embedded. Its value as an accountability tool depends entirely on whether that deficit is addressed, whether it is made public, is independently moderated, linked to formal inspection frameworks, and treated as a live accountability mechanism rather than a self-reporting exercise.

## The National Community Reference Group

The creation of the National Community Reference Group (NCRG) clearly demonstrates that public appetite for this work still exists.[4] At its fullest, it has access to around 300 volunteers organised into subgroups covering business, faith, data intelligence, academia, education, grassroots and LGBTQ+ communities, among others.

This group has recently convened events aimed at both police and community attendees. These have included:

- An event at a Kent Police auditorium addressed by Dr Stuart Lawrence, author and brother of Stephen Lawrence, to an audience of newly recruited frontline officers, many of whom were not aware of the murder of Stephen Lawrence.
- A seminar hosted at King's College, Cambridge, on possible bias in software solutions being implemented in policing. Attendees included leading academics, government agency leads, policing and the central PRAP team, with workshops throughout the day and a positioning paper submitted in the weeks that followed.
- In January 2026, the Community Reference Group co-hosted a Black Pioneers in Policing event at the National Black Archives in Brixton, bringing together figures including Norwell Roberts QPM, Dr Lolita Higgins and Michael Fuller QPM alongside current national chiefs. Personal accounts were shared and recorded not only for future generations but also to spare those involved from reliving those experiences repeatedly in unrecorded settings.

The NCRG benefits from being chaired by an individual who works with commitment and creativity. While the role is remunerated, the budget allocated does not reflect the amount of work required. Therefore, it is dependent on creativity, goodwill, independent resources and individual drive to steer its work. Policing has not consistently used the group to inform its key PRAP products or decisions as it could and should have. The most obvious example is the Maturity Matrix, with the NCRG not being used for consultation beyond the anti-racism commitment development stage.

The NCRG is best understood as an excellent potential resource. The infrastructure, the relationships, and crucially, the willingness to engage with policing are there.

What has been missing is the institutional commitment to use them.

## A model for data-led accountability: British Transport Police

The British Transport Police's approach to stop and search scrutiny also stands out as one of the more concrete examples of progress recorded across the five-year period.

During the period covered by the ISOB's third annual report, the British Transport Police reduced its ethnicity data gap in stop and search from 30% to 18% in two years, despite a national trend that moved in the opposite direction. Over the same general period, the rate of unreported ethnicity in stop and search across forces in England and Wales rose from 5% to 20%.[5]

BTP's progress was attributed to a combination of structured accountability mechanisms operating at the force and individual officer levels. Use of force incidents are recorded digitally, monitored for patterns, and reviewed in public meetings of the Police Standards and Integrity Committee. These sessions, part of the Police Authority Board, are live-streamed and publicly accessible.

An Independent Advisory and Scrutiny Group provides an additional layer of external review. Individual supervisors have access to a performance dashboard tracking officer-level stop and search activity, including rates of stops against Black people and outcome rates by officer. The Independent Office for Police Conduct's review of race discrimination in policing noted the British Transport Police's approach as an example of good practice.[6]

The ISOB observed that the mechanisms used by British Transport Police are not unique to the force. Digital recording of encounters, public scrutiny of use of force data, officer-level performance dashboards, and independent


advisory oversight with access to underlying evidence are tools available across policing. The question the British Transport Police example raises, and which the ISOB has consistently put to forces and to national policing leadership, is why similar progress has not been replicated more widely, and what structural conditions would need to change for it to be.

## Positive regional activity

Throughout the lifetime of the Plan, PRAP-driven initiatives have resulted in meaningful progress. One example is the recording of drivers' ethnicity during road traffic stops. This work began as an implementation of the recommendation from the 1999 Stephen Lawrence Inquiry to record all stops made under Section 163 of the Road Traffic Act 1988. As highlighted in previous ISOB reports, this initiative demonstrated strong coordination, strategic planning, and collaboration between national and local policing structures. Regional teams in forces such as Sussex and Surrey played a key role in piloting the work, supporting research and development, and testing the software required for the system to function

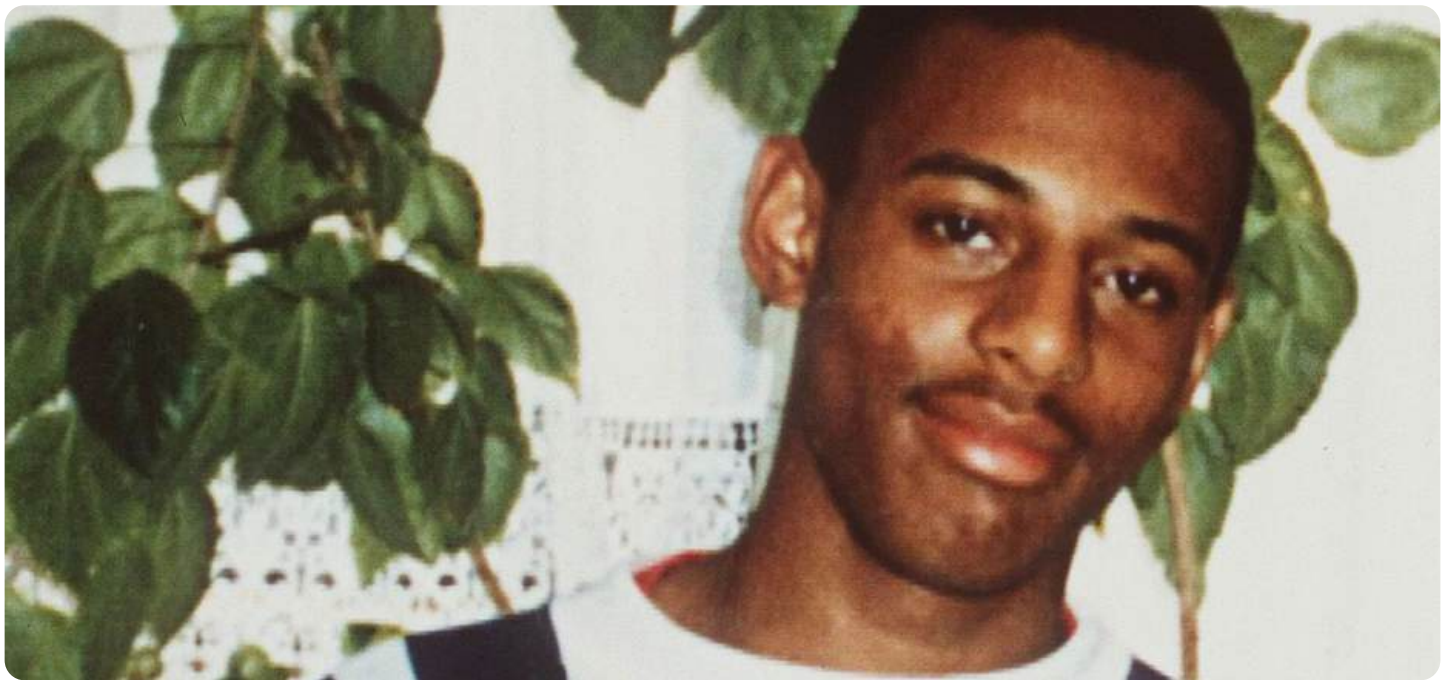
effectively. Through coordinated effort, the project's ambitions have since expanded beyond Section 163 stops to include recording the ethnicity of drivers stopped under any circumstance.

As a Board, the ISOB recognises that our scrutiny has necessarily focused on the national programme team. This has at times meant that local developments have received less attention within our work. Nonetheless, regional PRAP teams have demonstrated sustained commitment to advancing anti-racism within policing. In some forces, senior leaders have actively supported this work by committing resources, establishing local scrutiny structures, adapting national plans to regional contexts, and funding research, pilots, and community engagement activity.

In other forces, this work has progressed despite more limited institutional sponsorship. In those contexts, progress has often relied on individuals who have remained personally committed to PRAP's aims and have continued to push this work forward regardless.

While the outcomes of such efforts may not always have been as visible or well-resourced as in other areas, the persistence of these individuals has nonetheless enabled important progress. Much of this work has taken place through relationship-building with communities, incremental changes to internal practices, and the testing of new approaches that may inform wider adoption across policing in the future.

Taken together, these examples illustrate that meaningful progress under PRAP has often depended on the alignment of leadership support, local initiative, and sustained personal commitment. Where these factors have come together, forces have been able to pilot new approaches, strengthen scrutiny arrangements, and begin embedding anti-racist thinking into operational practice. While these pockets of good work have not always translated into consistent national delivery, they nonetheless demonstrate what is possible when the ambition of the Plan is matched with leadership, resources, and commitment to implementation.

Stephen Lawrence, Rex Features

## What did not work well

The PRAP was established with a clear and urgent mandate: to drive measurable change in how policing treats Black communities. While there were individuals within the Programme who worked hard in pursuit of it, there was a consistent pattern of structural and systemic failure that prevented the Programme from fulfilling its ambitions.

Policing's ingrained tendency toward what Baroness Casey termed 'initiativitis' - generating initiatives without clear outcomes and without seeing them through - was never meaningfully confronted by policing.[7] The Programme is now closing without a credible plan for embedding what was learned, without institutional acknowledgement of the scale of what remains unresolved, and without the foundational honesty that genuine reform requires. What follows examines, in detail, where and why the Programme fell short.

## The Elephant in the Room: Institutional Racism

As of March 2026, **only 6 of the 44 police forces in England and Wales covered by PRAP have publicly acknowledged institutional racism.**

They include:

- **Avon & Somerset Police**[8]
- **Bedfordshire Police**[9]
- **British Transport Police**[10]
- **Dorset Police**[11]
- **Gloucestershire Police**[12]
- **South Wales Police**[13]

Without a shared public acknowledgement of institutional racism, a programme designed to create an anti-racist police service cannot operate on fully agreed foundations.

Throughout PRAP's lifetime, the question of whether policing would publicly acknowledge institutional racism has sat beneath many of the issues discussed in this report.

**Why acknowledgement matters**

Sir William Macpherson's definition in the Stephen Lawrence Inquiry Report remains the most widely cited description of institutional racism:

> *"The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour, which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people."* [14]

Importantly, that definition was reached after receiving detailed evidence from experts, organisations, serving officers and staff, victims and community members. Macpherson was clear that institutional racism does not depend on the presence of explicitly racist individuals.

Instead, it arises from organisational systems and practices that produce discriminatory outcomes. As he warned:

> *"[Institutional racism] persists because of the failure of the organisation openly and adequately to recognise and address its existence and causes by policy, example and leadership. Without recognition and action to eliminate such racism it can prevail as part of the ethos or culture of the organisation. It is a corrosive disease."* [15]

This question is not simply symbolic. Whether an institution accepts the existence of institutional racism determines the kind of response it is willing to pursue to address racial inequality.

Where institutional racism is denied, or reframed as the result of individual failings rather than systemic processes, the response tends to focus on training, guidance, and statements of intent rather than structural reform. Recognising institutional racism requires examining the systems, policies and practices that produce unequal outcomes.

As one Regional ISOB member explained:

> ***"We stressed the importance of moving beyond over-reliance on unconscious bias training towards a stronger focus on institutional and systemic racism. Understanding why outcomes are different for Black people requires looking at the systems that produce those outcomes, not just the attitudes of the people operating within them."***

**Leadership responses during PRAP**

At the outset of the Programme, none of the 44 Chief Constables in England and Wales had publicly acknowledged that their forces were institutionally racist. Over the duration of PRAP, only a small number of leaders have done so.

When Avon and Somerset Chief Constable Sarah Crew publicly acknowledged institutional racism in June 2023, the local Police Federation chair accused her of promoting a "false narrative."[16] When the Merseyside Police and Crime Commissioner publicly accepted that her force was institutionally racist, the Chief Constable issued a statement within days rejecting that characterisation.[17]

There were, nevertheless, notable developments. In October 2024, South Wales Police Chief Constable Jeremy Vaughan applied Baroness Casey's four tests of institutional

racism to his own force and publicly accepted the conclusion.[18]

In January 2024, NPCC Chair, Chief Constable Gavin Stephens, acknowledged institutional racism in policing in England and Wales, a statement of genuine national significance.[19]

For a programme whose stated aim is to create an anti-racist police service rather than simply a more inclusive one, the absence of consistent acknowledgement of institutional racism represents a significant limitation. As Desmond Brown of the Independent Community Oversight & Scrutiny Board for Avon and Somerset observed in the ISOB's first annual feedback report:

> ***"If UK policing isn't institutionally racist, with no acknowledgement of both historical and current racism, then why do we need a plan to make it anti-racist?"*** [20]

The lack of a shared position on institutional racism meant that in its initial period, valuable PRAP time was spent debating the premise of the problem rather than focusing on how it should be addressed.

For the ISOB, this created a difficult starting point. Rather than being able to focus immediately on scrutinising delivery, it was repeatedly drawn into holding police leaders to account for the absence of consensus on an issue that sat at the foundation of the Programme itself. This was particularly aggravating for the Board, given that PRAP had been launched on the premise that policing needed to become anti-racist.

In practice, this dynamic allowed progress to stall. Time that could have been spent addressing structural inequality was instead absorbed by recurring debates about whether the problem existed in the first place.

Interviews conducted for this report suggest that a misunderstanding of the term institutional racism continues to shape resistance within policing. In particular, the concept is often interpreted as a personal accusation rather than a description of organisational processes.

As one scrutiny panel chair explained:

> ***"Senior leadership totally understand what institutional racism means, but there are officers who still think it means the chief has called them personally racist. So, you get that resistance — 'I'm not racist, why is the chief calling us racist?' And it's like, no, that's not what institutional racism means."***

Others suggested that attitudes within policing may be evolving, although unevenly:

> ***"I think it can sometimes still be very senior leads who are clinging on to that, whereas individual officers I've spoken to have used that language and it doesn't inspire that kind of defensiveness — they're quite acknowledging. I probably have a huge positive bias there, because officers who would proactively speak to us about this work aren't going to be officers who don't believe there's a problem, so I realise that won't be representative across all forces. But yes, I know that terminology was a trigger for a long time, though I actually think there's more openness now."***
>
> Civil society organisation policy lead

At the same time, interviewees highlighted the leadership pressures that continue to discourage public acknowledgement of institutional racism:

> ***They don't want to say there is racism. They don't want to say there is institutional racism. I think only five or six have come out and said it, and they do it just before they retire, because they are so worried about being popular. They don't want their people to not hold them in high regard. They don't want to be seen as accusing their own officers of being racist."***
>
> Senior Stakeholder within policing

> ***I think it can sometimes still be very senior leads who are clinging on to that, whereas individual officers I've spoken to have used that language and it doesn't inspire that kind of defensiveness — they're quite acknowledging.***
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> ***I probably have a huge positive bias there, because officers who would proactively speak to us about this work aren't going to be officers who don't believe there's a problem, so I realise that won't be representative across all forces. But yes, I know that terminology was a trigger for a long time, though I actually think there's more openness now."***
>
> Civil society organisation policy lead

Public acknowledgement of institutional racism by police leadership is a necessary starting point for meaningful change. Recognition alone, however, is not sufficient. It must be accompanied by structural reform, independent scrutiny, adequate resourcing, and a willingness to engage with those who remain sceptical about whether change is genuinely occurring.

## The absence of government oversight and involuntary accountability

Perhaps the most structurally significant finding in the PRAP's lifetime is the absence of central government leadership and statutory accountability. A programme designed to address structural, institutional racism was expected to achieve systemic change through the voluntary compliance of 44 individual Chief Constables, without government oversight or a formal inspection mandate.

In the first year of the PRAP, the then Home Secretary was actively working against the Programme's aims. This included rallying against "politically correct distractions" and "woke policing."[21] The Home Secretary wrote to Chief Constables to encourage more stop and search, despite clear race disparity data. She also endorsed relaxing suspicionless (Section 60) search powers, even while a live super-complaint into their use was being investigated.[22]

The ISOB publicly called, year after year, for the government to take meaningful responsibility for the Programme. In July 2024, with a new government having taken office, those calls intensified. By 2025, the Home Office had begun engaging with civil society organisations on future scrutiny mechanisms. However, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) had still not committed to formally incorporating PRAP outcomes into its inspection frameworks.

Sir Andy Cooke, outgoing HM Chief Inspector of Constabulary and Fire & Rescue Services, indicated openness to inspecting PRAP-related outcomes when the question was raised publicly at the National Black Police Association's annual conference in October 2024.

In March 2025, he confirmed that HMICFRS would continue to review racial disparities through existing inspection tools.[23] However, there was no agreement to fully embed the Maturity Matrix in formal inspection activity, with HMICFRS representatives explaining at a PRAP conference in May 2025 that this would be an unusual course of action for a national police programme. HMICFRS maintains that it has tried to align its questions to the Maturity Matrix as much as possible.

HMICFRS has stated that, as it inspects forces on their use of powers, disproportionality, and legitimacy, and has a focus on "EDI" (equality, diversity and inclusion) in workforce questions, outcomes from inspection will detail progress on PRAP's implementation. While it is positive that HMICFRS inspections overlap with some Matrix focus areas, the Maturity Matrix as a whole requires full commitment and thorough inspection to push policing towards anti-racism.

With central funding ending in March 2026, there is no clear plan for who will coordinate national delivery, how civil society scrutiny will be resourced, or what consequences will follow when forces fail to make progress against the Maturity Matrix standards. The National Black Police Association (NBPA) has called for a new oversight body housed within the Home Office, bringing together the NBPA, civil society and community leaders in a model inspired by the structures established following the Stephen Lawrence Inquiry Report. The ISOB has called on the Home Office to begin preparing now, before the handover, for the possibility of funding independent civil society scrutiny beyond March 2026.

## The Policy Landscape: The Government's Policing Reform Agenda

The Government's national policing reform white paper, *From Local to National: A New Model for Policing (January 2026)*, outlines the most significant restructuring of policing in England and Wales in a generation.[24] The document addresses governance, leadership, workforce, technology, and performance management. As the PRAP programme concludes, its legacy must be embedded within this evolving policy landscape.

There is common ground. The white paper's stated goals, restoring public trust, improving consistency, and modernising governance, overlap with PRAP's objectives. The PRAP central team has mentioned that engagement with the Home Office has led to a commitment to incorporate PRAP metrics into the new Police Performance Framework. If implemented, this integration could sustain anti-racism initiatives beyond the formal conclusion of the Programme. Ongoing monitoring will be necessary to assess how this commitment is reflected in the final framework as implementation advances.

However, a close reading raises questions that this report considers important. As outlined by anti-racism expert, Dr Shereen Daniels, the white paper's diagnosis of what has gone wrong with policing focuses on capability and inconsistency.[25] Its remedies aim to make policing work more efficiently and uniformly. What is largely absent is any sustained engagement with policing as a potential source of harm.

Racism is mentioned only once, and is framed as an individual discriminatory attitude rather than a structural issue within institutional design.

The white paper does not provide a substantive account of over-policing, under-protection, or the erosion of trust that PRAP was established to address. Stakeholders consulted for this report described the treatment of race accountability as minimal, with one noting it as a document that speaks "one line about police accountability and nothing else."

> *230. All communities rightly expect the highest standards from the police officers tasked with keeping them safe. Everyday our police officers embody qualities such as courage, teamwork and a commitment to public service. This should be recognised and celebrated. However, high-profile incidents of police misconduct and criminality have brought to light evidence of persistent negative behaviour in policing. Many cases have highlighted discriminatory attitudes and behaviours such as misogyny, racism and homophobia. Multiple reports have pointed to systemic issues in police culture which enable such behaviours. While some of these reports have been force specific, national reviews have found a culture of apathy and/or intolerance in some areas, including behaviours like misogyny.*
>
> **From local to national: a new model for policing. Home Office (2026)**[26]

Several proposals outlined in the white paper have direct implications for PRAP's objectives. The establishment of the National Police Service, which merges the NPCC and the College of Policing into a single entity, raises significant concerns regarding institutional memory. Both organisations have held direct responsibility for aspects of PRAP's delivery. The mechanisms by which anti-racism leadership and accountability will be preserved within the new structure remain uncertain.

The independent review of police leadership at all levels, led by Lord Blunkett and Lord Herbert and scheduled to report in summer 2026, represents a further missed opportunity. The review's terms of reference do not address race, diversity, or the conditions that enable racial harm to persist within leadership cultures.[27] This omission is significant given this report's findings on how leadership facilitates or impedes change, as discussed in Part 2.

On technology, the white paper commits to a £115 million investment in AI and the deployment of 40 new Live Facial Recognition vans nationally. Well-documented evidence on racial bias in facial recognition is absent from this discussion. More broadly, data systems built on historical policing patterns risk formalising existing disproportionality rather than correcting it. This risk applies directly to PRAP's data work if it is absorbed into the new technology agenda without adequate scrutiny.

The commitment to embed PRAP metrics within the performance framework is a positive development. However, metrics in a system primarily focused on efficiency and consistency do not equate to structural accountability for racial harm and equity. To ensure that anti-racism objectives are meaningfully advanced within the white paper's proposed structures, governance bodies must be explicitly empowered to address racial harm, rather than solely monitoring procedural compliance. This report is developed with this tension as a central consideration.

> ***As ISOB made the point a couple of years ago, the Home Office needs to be really involved in these things, or it can just easily be forgotten, given how leadership works in policing."***
>
> Policing correspondent


On 21 June 2023, around 60 people gathered in Penrith for the annual N8 PRP Policing Innovation Forum to discuss research, activism and innovative projects related to the NPCC's Police Race Action Plan. Representatives from academia, police, policy organisations, non-profits, and local government took part in panel and group discussions, sharing experience and best practice, identifying knowledge gaps, and finding new opportunities for collaboration.

More than Minutes created a record of the day's discussion.

## The persistent gap between activity and outcomes

The most consistent finding across the ISOB's independent scrutiny is the gap between what the Programme did and what changed as a result.

From the earliest days of ISOB oversight, the Board noted a tendency for the Race Action Programme to generate considerable activity, including meetings, surveys, working groups, pilots, guidance documents and forums, without being able to demonstrate a reliable connection between that activity and measurable improvement in the lives of Black communities, internal and external.

In its first report, the ISOB noted that actionable metrics were entirely absent from the published Plan. There was no baseline against which to measure success, no clarity about what completion would look like for any given commitment, and no way to know whether activity was driving change or simply filling time.

David Lammy's observation, given in evidence to the House of Commons Justice Committee, was cited in the first report and remains the most apt description of what the Board continued to find:

> ***"I detect a lot of activity, but activity should not be confused with meaningful and measurable outcomes on the ground."*** [28]

> ***"Policing organisations may assume that presenting activity equates to progress, whereas external stakeholders are often looking for evidence of outcomes and impact."***
>
> National ISOB Board member

This issue evolved over time. Engagement with communities and external stakeholders was persistently presented as consultation. When communities were asked for their views, there was rarely a visible mechanism for those views to feed back into Programme direction. The ISOB found it difficult to determine how the central team had converted external insights into meaningful action. A survey published in *The Voice* newspaper, promoted as a public consultation exercise, asked readers to select three priority actions per workstream from a list, with no background context provided and no demographic data collected. That this was presented as community consultation illustrated how wide the gap between rhetoric and practice had become.

Between May and August 2022, a separate survey received over 5,000 responses, with the College of Policing publishing results in February 2023.[29] Frustratingly, however, it was extremely difficult to see how key insights from the survey were actually being fed into PRAP direction and decision-making.

The third year brought some improvements in process and communication, but the fundamental pattern persisted. Most delivery remained at the pilot or planning stage. The *Professional Conversations* mentoring scheme, aiming to pair senior police with external Black executives, concluded with just four active pairings and has not progressed to a national rollout. A restorative justice pilot attracted a single police force, which subsequently withdrew. These outcomes are not evidence of a Programme that has achieved transformation.

Any successor mechanism must begin with outcomes. The question cannot simply be 'what will we do?' The starting point must be 'what will be different for Black communities and Black officers, by when, and how will we know?'

Every commitment must be traceable to a measurable outcome, and that outcome must be assessed by someone with the independence and authority to say honestly whether it has been achieved.

## A structure that reproduced what it was meant to dismantle

One of the most significant and uncomfortable findings across five years of scrutiny concerns the PRAP's internal structure. It was one that consistently reproduced the hierarchical inequalities the Programme was designed to address.

From the start, the ISOB observed that the Programme had adopted a structure that mirrored policing's own hierarchy: pyramidal, rank-based, with the most substantive work being done by those with the least decision-making power.[30] The ISOB's recommendation in its first report, that the Programme be restructured to recruit people based on demonstrated commitment to and expertise in anti-racism work rather than rank, was a crucial recommendation, but was not accepted. This was a missed opportunity.

While minor personnel changes had been made, the fundamental architecture remained unchanged. Anti-racism training for central team members was only introduced three years after the Programme launched. A proven track record in anti-racism work or expertise was never formally required by any job description for Race Action Plan roles.

In addition, for the staff doing the work on the Programme, there was never psychological safety, a key aspect of any anti-racism work. The people in the central team were, in many cases, personally affected by the very issues they were working to address. They had worked hard to reach their positions in their respective forces, and then found themselves in an environment that was under-resourced and described as "chaotic" by one of this report's interviewees. Without this foundation of safety, interviewees mentioned, feedback and scrutiny felt like criticism and relationships with potential allies broke down. Secondments were cut short without explanation or with very little notice. Roles were re-advertised without addressing concerns raised about the process.

**Policing's Relationship with the National Black Police Association (NBPA)**

The relationship between the NBPA and policing leadership deteriorated over the course of the Programme. Established in 1998 in response to the failure of mainstream police associations to adequately represent Black officers and staff, the NBPA was positioned as a key stakeholder and essential partner in PRAP. In practice, however, the official relationship has not operated as an effective partnership.

According to NBPA President Andy George, members involved in PRAP continued to experience longstanding challenges within policing. When drawing on their lived experience, they were often perceived as "too challenging," and commitments to career development were not consistently realised. Tensions were further exacerbated by instances where PRAP actions were reported as "complete" at the Programme Board level without consultation with, or awareness of, the NBPA.[31]

In June 2024, the NBPA formally suspended its support for PRAP. Although the organisation later re-engaged, tensions between NBPA and policing leadership remained. Both parties described attempts to engage constructively, but neither expressed confidence that those efforts had been reciprocated or effective.

This breakdown had wider implications for the Programme. When the PRAP central team began to establish meaningful engagement with civil society organisations, including consultation on the Anti-Racism Commitment, the NBPA was not formally part of those discussions. Although, it should be noted that various NBPA members continued to serve on the PRAP central team and regional teams. This tension, however, placed external stakeholders in a difficult position: seeking to contribute to the Programme's development while also recognising the absence of a key representative body for Black officers and staff. In practice, many attempted to do both. However, the lack of direct and effective communication between policing and the NBPA limited the depth and quality of those conversations.

The ISOB sought, where possible, to support dialogue between the NBPA and policing leadership. However, these discussions often became circular and reflected deeply embedded issues not readily resolved within the Programme's structures. At a certain point, it became necessary for the ISOB to step back from attempting to mediate this relationship and refocus on its broader scrutiny role. The relationship between policing and the NBPA sits within policing's own institutional responsibility and cannot be resolved through oversight alone.

It is also important to recognise the context in which this relationship exists. The NBPA represents officers and staff who have experienced racism within policing, often over sustained periods of time. That reality requires a sensitive and considered approach from policing leadership. At the same time, the period of disengagement highlighted challenges on all sides, including a lack of clarity, consistency, and structure as to how engagement was conducted.

Outside of formal PRAP structures, the NBPA describes a policing environment that, in some respects, has not improved and may have become more hostile. Members report incidents of direct racism being addressed through reflective practice rather than formal sanction, and colleagues reaching crisis point after feeling unsupported by the institution.

Fundamentally, policing must address its formal relationship with the NBPA if it is to make meaningful progress towards becoming anti-racist. The NBPA represents a critical voice within policing, grounded in the lived experience of the issues PRAP seeks to address. A more effective, transparent and accountable relationship - one that enables challenge, builds trust, and supports constructive engagement - will be essential if the ambitions of the Programme are to be realised.

*I find the Met...even though they've had more problems pointed out than any other force, I still find them incredibly insular and self-focused. They think they've got all the answers to their own problems and they're very defensive about anyone external trying to influence that, despite the fact that they have had the worst evidence against them in terms of their response. Whereas other forces, who haven't necessarily had the scandals, haven't had as much proof that they've got a problem, are proactively seeking external advice about how to address it. I just don't understand why the Met which is one of the more diverse forces can't get even a remote handle on its own attitudes towards change, whereas other really rural forces - who don't have particularly diverse staff or communities - are still actively seeking ways to improve. It really frustrates me."*

Civil society policy lead

## How do you solve a problem like the Met?


The Metropolitan Police Service, "the Met", holds a position across the Plan that is both central and deeply problematic. It is the largest police force in England and Wales. The Met employs nearly one in four officers nationally and is responsible for approximately one-third of all stop-and-searches. It serves a city where 13.5 per cent of the population is Black.[32] Given these facts, the Met's engagement with PRAP was always going to be decisive.

For every year of the PRAP, and despite having its own London Race Action Plan (LRAP) for some of that period, the Met was embroiled in a high-profile race-related scandal.


In meetings with Met leadership, they have referred to the force as "the most reviewed police force in England and Wales." This perspective risks obscuring the more important point. The issue is not the number of reviews, but the consistency and severity of their findings, and the extent to which those findings have led to meaningful change. Over a sustained period, independent reviews, inspections, and inquiries have repeatedly identified the same underlying cultural and structural problems.

The persistence of these findings suggests that the challenge is not one of excessive scrutiny, but of insufficient response. To characterise the Met as over-scrutinised risks reframing scrutiny as the problem, rather than recognising it as a necessary consequence of long-standing and unresolved failings.

The Met was slow to implement PRAP locally. The ISOB had expressed that the Casey Review findings should prompt a centralised and sustained focus on tackling racism within the force.

Yet, by the time of the second ISOB annual feedback report, improvement was limited. The Met had stopped recording the ethnicity of drivers stopped by its officers, a step directly contrary to a recommendation that had stood since the 1999 Stephen Lawrence Inquiry. In addition, Black officers made up only 3.6% of the Metropolitan Police workforce, yet accounted for 12.5% of all misconduct cases.[41] That disparity appeared to have grown since the Casey Review. The NBPA called for a recruitment boycott of the force in February 2024 due to issues affecting its membership.[42]

The ISOB attended the Met's Central Uniform Scrutiny Panel and found no independent London residents present. All attendees were Met police, staff or volunteers recruited by the force. The panel lacked racial diversity and skewed towards older participants, despite 46.2% of London's residents identifying as non-white. Panel members were restricted to binary pass-or-fail decisions on body-worn video footage with no formal mechanism for escalating concerns.

When the Metropolitan Police launched its new Stop and Search Charter in February 2025, the launch event was invitation-only, and the ISOB's request for the recording to be made publicly available was declined. The Charter acknowledged the disproportionate use of stop and search against Black communities only briefly before pivoting to the argument that higher victimisation rates among those communities justified increased police scrutiny, a framing that the ISOB found both factually questionable and deeply discouraging.

The NBPA's recommendation, in the ISOB's 2025 report, that the Met's London Race Action Plan be formally separated from the national programme, reflects how serious this situation has become. The Metropolitan Police's cultural challenges are both extreme and relatively unique, and its inclusion in national processes has, at times, acted as a constraint on progress rather than a driver of it. A dedicated, high-scrutiny framework for London, one that reflects the scale of harm done to Black Londoners and the depth of institutional failure, deserves serious consideration in the design of any successor mechanism.

Recent developments raise further questions about the Met's strategic direction. The force has moved away from its London Race Action Plan structures, including rebranding the LRAP Strategic Delivery Group to a "30 Patterns of Harm" delivery group, despite the Patterns of Harm author publicly withdrawing from working with the organisation. This delivery group is now being subsumed into a broader "Inclusion Strategy," which the Met states is intended to embed organisational values, professionalism, and lived experience across the force.[43]

While the stated ambition of this shift is to achieve structural, organisation-wide change, it also represents a move away from a clearly defined, race-specific action plan towards a broader inclusion framework. This raises important questions about whether the specific focus required to address anti-Black racism, particularly in light of the Met's well-documented challenges, will be maintained or diluted within a wider agenda.

The Met has emphasised that anti-racist work will continue within this new structure, and that independent scrutiny will remain in place through advisory groups, community reference groups, and internal networks. However, valid concerns have been raised, including by civil society commentators, that this shift risks reducing the focus that a dedicated race action plan would provide.[44]

## A BRIEF TIMELINE OF MET RACE-RELATED INCIDENTS

**2021** An inquiry is launched after a 14-year-old Black schoolboy and his mother lodge a formal complaint for racist targeting after he claims to have been stopped by police about 30 times over a two-year period.[33]

**2022** The case of *Child* Q draws national attention after a Black schoolgirl is strip-searched by Metropolitan Police officers at school while menstruating and without an appropriate adult present. A safeguarding review later finds the search to be unjustified, raising serious concerns about adultification bias, safeguarding failures, and the treatment of Black children by the police.[34]

Operation Hotton, a series of nine linked investigations (2018–2022) by the Independent Office for Police Conduct (IOPC) into gross misconduct by 14 Met officers, primarily based at Charing Cross Police Station, uncovers a toxic culture of misogyny, racism, bullying, and sexual harassment, including officers sharing WhatsApp messages joking about rape, violence against women, and domestic abuse.[35]

**2023** The Baroness Casey Review finds the Met to be institutionally racist, misogynistic, and homophobic, with broken misconduct procedures, a failure to protect women and children, and a culture of denial.[36]

**2024** The Angiolini Inquiry finds a culture of widespread sexism and racism within the Met.[37]

**2025** A BBC *Panorama* investigation uncovers widespread racist and misogynistic behaviour at Charing Cross Police Station, London's busiest police station.[38] A month later, a report by Dr Shereen Daniels into anti-Black harm within the force found "systematic racism" within the Met's leadership, governance and culture.[39]

**2026** Research by the Mayor's Office for Policing and Crime and King's College London finds that Black Londoners experience about 4,300 more stop and searches each year than white Londoners, roughly one stop every two hours.[40]

# The ISOB: What it is and how it has worked

The ISOB was not a government body. It was not an arm of policing. It was an externally constituted group of people with expertise in areas relevant to its mandate, appointed to provide genuinely independent scrutiny of the PRAP. That independence was fundamental to its purpose.

Over five years, the ISOB has reviewed every document produced by the PRAP team, engaged regularly with workstream leads and Programme leadership, challenged the evidence base on which claims of progress were made, and published its own annual feedback reports. Those reports have been frank, naming what has not worked as clearly as what has. It has maintained the position, consistently, that aspiration is not the same as achievement.

> ***"The existence of the ISOB, and its preparedness to be robustly independent in its analysis of policing's performance, was very powerful. It forced policing to reflect more openly about itself and its shortcomings in a way that many senior people in policing were not prepared for."***
>
> Senior policing advisor

## What worked well

### Independent and public scrutiny

The majority of interviewees for this report stated that the ISOB's most significant contribution was the quality and consistency of its scrutiny. Through its annual reports and regular review meetings, the Board subjected policing's processes, documents and decision-making to sustained, evidence-based challenge.

That challenge operated as a continuous cadence of oversight over the course of PRAP. Priorities identified by the ISOB did not slip. The combination of regular engagement and credible public reporting meant that policing could not simply assert progress where little existed.

The annual reports emerged as a body of work of genuine authority. Their willingness to record negative findings about a major national programme distinguished them from the internal reporting that typically surrounds initiatives of this kind.

Senior policing professionals reflected that the reports were forensic, hard to dispute, and taken seriously as a result. The ISOB's analysis of PRAP's progress played a direct role in shaping the Maturity Matrix, now the flagship product of the Plan and the one output intended to endure beyond the Programme's closure.

The Board's independence also allowed it to ask questions of Chief Constables that those working inside the programme structure could not safely raise. As mentioned earlier in this report, policing is a hierarchical institution, and individuals on secondment to PRAP were constrained in the challenge they could direct to senior leaders. It pressed for clarity on delivery milestones and the rationale behind decisions in


> ***One of the best impressions of it I got was a report from a couple of years ago that was quite challenging about actual progress on the Plan. I found it really interesting seeing negative feedback about a national programme, because you don't often see that.***
>
> ***Obviously, you don't want to see negative things because that means things aren't working as well as they should, but it does imply there's some transparency and accountability going on. Otherwise it can feel like everyone's patting each other on the back."***
>
> Civil society organisation policy lead

ways that prompted teams to revisit their approach. That independence was highlighted as central to the ISOB's effectiveness.

> ***"Policing is a very hierarchical institution, and people within the PRAP team who are on secondment will have been thinking about their next role. The last thing they want to do is upset 43 Chief Constables if they're about to come off secondment and look for a new post. Abi (ISOB Chair, Abimbola Johnson) can do that very safely. It's not psychologically safe for us to do it, but it is for her."***
>
> Senior policing staff

> ***"...it demonstrates why funded, independent oversight structures like that are so important — their well-founded positions as data and policy experts is essential. The reports produced have been particularly valuable in highlighting the difficulties of oversight."***
>
> CEO of a leading Black organisation

## Centring outcomes for Black communities

It was noted that the Board's consistent reorienting the frame within which progress was assessed. It pressed for the lived experiences of Black communities to be treated as the primary reference point, rather than one consideration among many operational metrics. It maintained pressure for genuine community engagement at a time when policing's instinct was to turn inward. The evidence is clear that without the ISOB, the question of public consultation may not have been seriously considered at all.

> ***"I think the pressure to remember that the whole point of this is the public - I felt was a message that came through ISOB and was very important, because policing can get very internal and very data processing. And that, I think, is what would have happened without ISOB.***
>
> ***So the pressure, or the reminder that the outcome, the final outcomes of this change, would be better policing for the public, a better experience for the public, the need to think about the community as the key stakeholders, rather than oneself or the chief constables or whatever. I think that did come - that was a value of having ISOB running alongside PRAP, because I genuinely think that would just never been considered otherwise."***
>
> Senior policing leader

> ***"From my standpoint, we've ensured that conversations directly consider the lived experiences of Black communities rather than treating race equality as a purely operational metric. That shift in perspective, in my view, has been a real contribution."***
>
> National ISOB Board member

## Leveraging external expertise

The ISOB built and sustained relationships with civil society organisations, community groups, and those engaged in anti-racism work across the country.

Those relationships provided intelligence, perspective, and the kind of ground-level reality check that scrutiny of policy documents alone cannot supply. They strengthened the Board's analytical base and its legitimacy as a body genuinely connected to the communities whose trust in policing the programme set out to rebuild.

# Structural failures and missed opportunities

## Scrutiny without enforcement

While the ISOB's scrutiny was robust, scrutiny without enforcement is, ultimately, advisory. That is the central limitation running through the Board's five years of work.

The ISOB could identify failures, name them publicly, and revisit them year after year. What it could not do was compel a meaningful and change-based response. Recommendations were accepted in principle, but largely left unimplemented; the same problems resurfaced in successive reports. The gap between what the ISOB said needed to happen and what actually changed remained wide in too many areas.

Every other finding in this report points back to the same structural reality: the PRAP was a voluntary programme. Forces could engage with it or not. They could implement its recommendations or not. With no legal duty to engage, no inspection framework giving scrutiny findings formal weight, and no consequences for non-compliance beyond reputational pressure, the pace and depth of change depended entirely on individual goodwill.

> ***My career within race equality goes back twenty years. I feel like we have been here before, post-Macpherson and everything that came after. We have done this before and it did not last. What is different this time? And the honest answer is: not enough."***
>
> Civil society leader

The history of policing's relationship with race equality reviews and reform programmes makes the stakes of that structural weakness very clear.

Reputational pressure is not insignificant. The ISOB's annual reports and the media attention they generated created real pressure on policing to respond to criticism and show progress. However, reputational pressure is episodic and unstable. It peaks when a report is published and fades in the following weeks. It can be managed through communications and narrative instead of genuine change. It also works better on some leaders than others.

Multiple contributors to this report argued that the most important structural development for the next phase would be for the statutory duties on policing to address racial disproportionality to be more specifically backed by an inspection framework with the authority and resources to hold forces to account.[45] HMICFRS was most often cited as the body best placed to fulfil this function, given its inspection mandate and statutory independence from policing. The argument was that this ensures that when good faith fails, as it inevitably does at times, there is a mechanism to address the gap.

> ***I think that because it didn't have any teeth – and I think that was deliberate – that they could go in and sanction. It's not like they were like CQC, who would go in and fail a children's care home or something like that, or whether it got embedded in the inspectorate, where then they would come down on them hard."***
>
> CEO of a civil society organisation

> ***I think all of the intentions and the people involved in ISOB absolutely joined for really good reasons, and I think that their reports have been really blunt. But again, unless there is some sort of political will and or also any shame that comes with actually maybe we're not doing what we should be doing here."***
>
> CEO of a civil society organisation

## Relationship with the central PRAP team

The relationship between the ISOB and the PRAP central team was more strained than it should have been, and the evidence gathered for this report points to several structural and contextual factors that contributed to that.

The central team operated under considerable pressure, without adequate support and without sufficient grounding in the anti-racism expertise the work required. In that context, external scrutiny was frequently experienced as an attack rather than as a constructive challenge. This was compounded by the fact that the ISOB's scrutiny was largely directed at the central team rather than at those with actual authority to drive change across policing. Early attempts to broaden the ISOB's access to meetings where PRAP engaged directly with police leaders were blocked, although over time and with changes in PRAP leadership, this improved. It did mean, however, that the people bearing the most direct burden of scrutiny were often not the ones with the decision-making power to implement it. That is a structural design problem, and one that any future programme should explicitly seek to avoid.

A further contributing factor was a fundamental mismatch between how the ISOB had been conceived and what it became in practice. The original model anticipated something closer to a paper-review function: a board that would receive updates, review documents, and ask questions at meetings. There was surprise that the ISOB would want to publish annual reports, especially public ones that would invite additional external scrutiny of the PRAP.

The terms of reference that were eventually developed described something considerably more demanding, but the structural and financial assumptions underpinning the Programme were never updated to reflect that. The ISOB that operated in practice was an active, independent scrutiny body conducting ongoing oversight across a complex national programme. The central team had not been prepared for that, and the gap between what had been expected and what arrived shaped the early dynamics of the relationship.

Where leadership of the Programme changed in 2023 and created the conditions for a more open working relationship, the dynamic improved markedly. More constructive Programme leadership, combined with greater ISOB access to PRAP-adjacent meetings and direct engagement with leads such as the national stop and search lead, shifted the relationship from one characterised by defensiveness to one that was more functional.

The clearest learning is therefore not about the behaviour of either party, but about the design of the programme around them. A scrutiny function and a delivery team working in proximity on contested, sensitive work will inevitably generate tension. The question is whether the programme is structured in ways that make that tension productive.

## The siloed nature of PRAP scrutiny

The structural limitation described above had a wider dimension beyond the relationship with the central team. The ISOB's scrutiny was largely focused on PRAP's central team. The Programme was the formal object of its scrutiny mandate as stated in its terms of reference. However, it resulted in other national programmes, portfolios and structures with significant bearing on race equity in policing sitting outside the ISOB's line of sight.

For example, the ISOB was involved in elements of stop and search work, but it was not integrated into the broader policing structures where, arguably, there is more influence to be exercised in shaping an anti-racist police service. Those levers, other national programmes and strategic coordination structures, were not scrutinised. As one senior figure involved in the Programme observed, there is a view that the ISOB was really focused on the Plan's work, and perhaps less aware of other things happening in policing that had a bigger impact. That same observer was clear that this was not simply a reflection on the ISOB, but also on the Plan itself, which had perhaps been a little siloed, more focused on delivering actions than on the strategic coordination work of pulling different levers across the system.

The Welsh scrutiny model points to what a more expansive architecture could look like. The Independent Oversight Advisory Panel, established to scrutinise the Criminal Justice Anti-Racism Action Plan for Wales, was designed from the outset to hold multiple agencies to account simultaneously. It covers policing, the Crown Prosecution Service, probation and HM Courts & Tribunals Service within a single scrutiny framework. It organised its work thematically across seven commitments, with panel members taking paired lead responsibility for each theme, and developed a Criminal Justice Ethnicity Data Dashboard as a transparency and accountability tool spanning the whole system. That cross-agency design meant the panel could see how failure in one part of the criminal justice pipeline connected to failure in another. A line of sight the ISOB, trained entirely on one programme within one institution, was structurally unable to achieve.

## Community and youth engagement

The ISOB also operated with insufficient reach beyond the policing system it was scrutinising. Its reports were credible and well-regarded, albeit challenging, but were less well-known beyond it. Black communities, most affected by the failures the ISOB was documenting, were rarely the primary audience for its outputs, and the Board did not develop a sustained strategy for changing that.

Part of this was a resource problem. ISOB members were allocated sixteen hours per month, a figure that those doing the work consistently exceeded and still regarded as insufficient.

A significant proportion of that time was consumed by reading: the policing documents, action plans, data reports, and meeting papers that formed the basis of the Board's scrutiny. Members were consistent that this reading could not be done superficially. The forensic quality of the ISOB's challenge depended entirely on having an unquestionable grasp of the subject and being able to make connections. One Board member was explicit that even at double the allocated hours, there was still not enough time for the reading alone. Sixteen hours a month was not a part-time commitment to a national scrutiny function. In practice, it was barely enough to stay on top of the paperwork.

Another part of the limited reach was also the "gravitational pull" of the policing process itself. As one Board member acknowledged, the ISOB was drawn into the operational detail of PRAP's internal workings. With greater capacity and a more deliberate strategy, it might have built a public, community-facing accountability function to bring more people into its scrutiny.

Even well-designed scrutiny, conducted with genuine independence and forensic rigour, will have limited impact if it does not compel a response, reach the communities it exists to serve, and does not build a relationship with the body it oversees that is capable of receiving challenge without collapsing into defensiveness.

## Resourcing independent scrutiny

One of the least visible, but most consequential failings in the design of the PRAP's scrutiny function was not thinking seriously about what independent scrutiny requires in practice. The ISOB was established as an independent body, but the infrastructure needed to support that independence: administrative systems, secretarial capacity, meeting facilities and data access were not proactively constructed by policing.

The gap between what was assumed and what was required became apparent early. The mismatch between the resourcing model and the actual work was instead worked around.

On the administrative side, the ISOB never had a reliably functional system for keeping board members connected to what was happening across the Programme. The only period this worked well was when someone within the NPCC maintained a shared calendar that the secretariat and board members could consult each month, allowing them to identify events they wanted to attend and request access.
When that arrangement ended, information sharing became reactive and opaque. Conferences, meetings and decisions that the ISOB would have known about in advance were often heard about only after the fact.

The ISOB's secretariat's effectiveness was directly constrained by the absence of synced-up working systems. Without a consistent, shared administrative infrastructure that the Board and PRAP understood and used in the same way, the coordination burden fell on individuals rather than systems.

This extended to the most basic practicalities of scheduling: PRAP would change meetings in Board members' diaries unilaterally, propose times with little regard for the fact that Board members had other professional commitments, and the Board was left feeling that the logistics of engagement were something members should simply accommodate rather than something to be collaboratively managed. For a body working across multiple workstreams with part-time, independent members who have their own professional and personal lives and commitments, administrative support is essential.

The question of remuneration and independence is, in practice, the same point. Both determine whether a scrutiny body can operate on its own terms or is structurally dependent on the goodwill of the body it is scrutinising.

As the initial ISOB model reflected the paper-review function PRAP originally imagined, the assumed expenses did not match the reality of how ISOB would operate in its evolved form. PRAP proposed that the Board meet on police premises, that the chair use an NPCC-issued laptop, and that materials and communications flow through NPCC systems. Each of these arrangements would have placed ISOB outputs under NPCC ownership and control.

The Board was able to resist all of this, paying upfront for expenses such as remote meeting platforms, the ISOB website and cloud storage, external meeting room hire, and, when needed, accommodation and travel costs for PRAP meetings and conferences involving long-distance travel.

However, the Board's ability to do so depended entirely on the personal and professional circumstances of those involved: the financial stability to front costs until expenses were reimbursed, the flexibility self-employment gave some to manage their own time, and the professional infrastructure (e.g., meeting rooms) to hold meetings independently.

That is not a replicable model, and it should not need to be. Independence cannot depend on who chairs the board or what resources they personally command. It must be structurally guaranteed from the outset, with remuneration that reflects the actual work required, administrative systems owned by the scrutiny body rather than the body it scrutinises, and a clear framework for independent operation before the first board member is appointed.

## Lessons for scrutiny: What comes next

The conclusion of the ISOB and PRAP programmes creates a significant gap. Interviews for this report revealed a consistent concern: there is no clear plan for scrutiny after March 2026, and in many areas, the issue has not been seriously addressed. One regional scrutiny lead noted that forces have not discussed this transition with them. A sudden end, as several interviewees warned, would benefit those who were never committed to change.

**The gathered here not only identifies the problem, but also outlines what a credible solution should include. Six consistent themes emerged.**

- **Genuine independence, designed for longevity.** Future scrutiny bodies must be separate from the institutions they oversee, have their own mandate, and avoid becoming too aligned with policing. Scrutiny must remain objective and challenging to be effective.

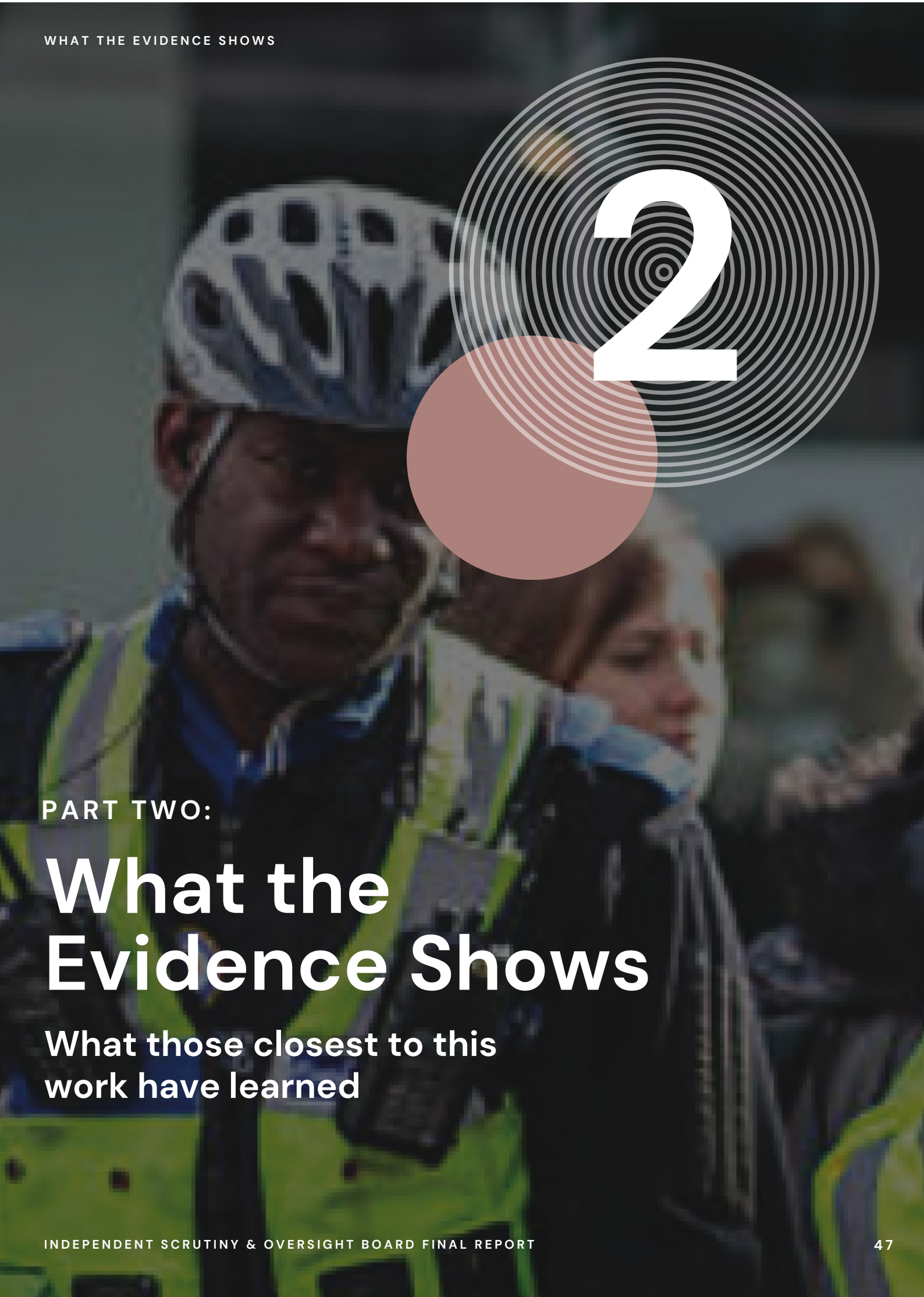
- **Proper funding, not reliant on civil society.** Interviewees repeatedly stressed that civil society organisations should not fund the scrutiny of the institutions they hold accountable. These organisations are already stretched, focusing on sustaining staff and programmes. Funding responsibility should rest with the scrutinised institutions, statutory sources, or central government.

- **Effective leadership and board composition are essential.** Interviewees highlighted the importance of appointing a chair with genuine commitment rather than personal interest. The board should include members with technical expertise, analytical skills, lived experience, and community trust.

- **Access to data, with authority to analyse it.** Interviewees agreed that data access is essential. Requirements include transparent, disaggregated data by ethnicity and outcome; analytical capacity within the scrutiny body; and feedback mechanisms that connect data to community experience. Scrutiny must be able to examine methodologies, not just receive summary reports, to ensure meaningful oversight.

- **Clear powers and escalation routes.** Scrutiny must have mechanisms to compel responses. Interviewees stressed the need to agree on governance and escalation routes in advance to ensure challenges lead to action. Performance against outcomes should be publicly scrutinised and transparently reported, using multiple accountability mechanisms to embed race equity throughout.

- **A design that does not rely solely on government support.** Interviewees highlighted the structural fragility of relying on Government, as priorities and leadership often change. Sustained pressure has come from Black civil society organisations and community voices, which have kept these issues prominent. Both technical scrutiny and external political pressure are necessary, and neither can replace the other. Scrutiny structures dependent on ongoing ministerial commitment are inherently fragile.



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PART TWO:

# What the Evidence Shows

## What those closest to this work have learned

# What the evidence shows

**This section of the report examines key themes around engaging policing on anti-racism. Eight themes emerged consistently across conversations.**

**The themes are not entirely separate from one another; they are interconnected, and most of the interviews touched on several simultaneously. They are presented in the order in which they came up most frequently and with the most force.**

## Leadership: An enabler and barrier

The most common response across all interviews on what drives progress on anti-racism in policing was leadership. The presence or absence of senior people who genuinely, visibly and sustainably commit to this work is, according to everyone who has observed it closely, the single most important variable in determining whether things change.

This finding is both encouraging and deeply uncomfortable. Encouraging, because it means change is possible; we have seen it happen, in specific forces and at specific moments in the life of the PRAP. Uncomfortable, because it means that progress, to date, has been built on individuals rather than institutions. And individuals move on, especially in policing.

The pattern was described repeatedly. A senior leader, sometimes a Chief Constable, arrives with a genuine commitment to race equity. They build relationships with community organisations, create space for honest conversations about disproportionality and culture, and things begin to shift. Then they move on, through promotion, retirement or a change in personal priorities, and the person who replaces them has different

> ***I have heard external stakeholders say time and time again: we had this really good commander in place, we were just getting to know them, and then after two years they were moved on to something else. For scrutiny, what you really need is people in place who form a diverse group with different lived experience, and you need that in place for quite a while."***
>
> Senior policing leader

> ***The more that this is about individual leadership and personal relationships, the more fragile and unsustainable it becomes. We need structures that survive changes in personnel."***
>
> Civil society leader

views, different priorities, or simply different crises to manage. The work stalls, and sometimes it unravels entirely.

> ***"If this is not managed correctly, we will be having the same conversations in ten years, and the relationship with communities will have soured."***
>
> Community organisation leader in a metropolitan county in the North West of England

A community advocate in a coastal county in South East England named this fragility directly. A period of genuine progress under a new senior leader in their force was preceded by a hiatus described as "rudderless," with a commitment to anti-racist working stated but not driven. What changed things was a new senior leader who, crucially, did not come from a policing background. People bring their commitment to change because of their own experience and abilities, the advocate observed, and that makes a difference that a job title alone cannot manufacture.

A community organisation leader in a metropolitan county in North West England described an almost identical pattern from a different vantage point. They had delivered anti-racism training to their local force, sat on the scrutiny panel, and built working relationships with specific officers over the years. Then a new Chief Constable arrived, and the direction changed, with the new leader deprioritising the work. Having been in policing for several years, they said, this is essentially what happens: policy and process are generated, there is organisational change, and while the organisation is adapting, progress falls by the wayside.

Part of the explanation lies in the structure of policing itself. With 43 separate forces, each with its own Chief Constable, Police and Crime Commissioner - though this is changing - local history and culture, national programmes depend on local implementation. The PRAP team could provide guidance, tools and support, but it could not compel a Chief Constable to make race equity a genuine priority rather than a compliance exercise.

A second part of the explanation lies in who the senior policing leaders are. The interviewees were frank about this. Most Chief Constables have spent their entire careers within policing, joining as officers in their late teens or early twenties and rising through the ranks of an institution with its own distinct culture and ideas about what matters. Many have little professional experience elsewhere.

> ***"Most Chief Constables have about thirty years in. They have done it since they were eighteen or nineteen. They have not ever worked anywhere else. They know nothing else, know no other culture, probably have no Black friends or family. And they are all white."***
>
> Senior policing professional

This lack of exposure to work outside of policing, as well as the racial homogeneity in senior police leadership, means that, as a group, police leadership is lacking in the lived experience that would otherwise assist in challenging the institution's way of thinking and operating.

## Data and evaluation: A prerequisite

As mentioned earlier in the report, one of the ISOB's most important and sustained contributions over five years has been pushing the PRAP away from measuring activity and towards measuring outcomes.

The distinction is fundamental. Measuring activity means asking: Did you do the thing? Did you run the training course, hold the consultation event, and publish the strategy? Measuring outcomes means asking: Did it make a difference? Are Black people's experiences of policing actually improving?

Independent analysis of structural racism in policing has given this pattern a precise name. Where action plans multiply tasks without changing the underlying conditions that produce harm, they function as a management of appearance rather than a transformation of outcomes.

**Strategic plans multiply tasks but defer change.**

*When plans are organised around activities rather than outcomes, they can create the impression of momentum while leaving the structural conditions that produce harm entirely intact.*[46]

**Dr Shereen Daniels, 30 *Patterns of Harm***

The Maturity Matrix needs to ensure that every force in England and Wales is assessed according to where it is on a journey towards race equity across the four workstreams, using specific criteria and specific data. Crucially, it will need to set out not just where forces are, but where they need to get to, and to link that destination to measurable changes in outcomes.

> ***"The main thing for me is having specific metrics with a direction written down. For example: trust from the Black population in the police needs to rise to equal or above the trust the white population has. That is a specific metric that can be measured. They did not want to touch it with a bargepole."***
>
> National ISOB board member

Even where data was collected, the challenge of what to do with it recurred across the interviews. The distinction between tracking disproportionality and actually transforming it was named by multiple contributors as one of the most persistent tensions in the programme.

**Disproportionality is tracked, not transformed.**

*Collecting data on racial disparities is not the same as acting on it. When data collection becomes a performance of awareness rather than a driver of change, it can provide institutional reassurance without producing the outcomes it was designed to measure.*[47]

**Dr Shereen Daniels, 30 *Patterns of Harm***

The data challenge extended beyond the national programme. Contributors across regional scrutiny boards identified data quality as a practical barrier to holding policing to account. In Wales, data was collected at the UK level rather than the Welsh level, preventing specific analysis of Welsh issues. When scrutiny boards requested force-level data, they were sometimes informed it was outside their terms of reference.

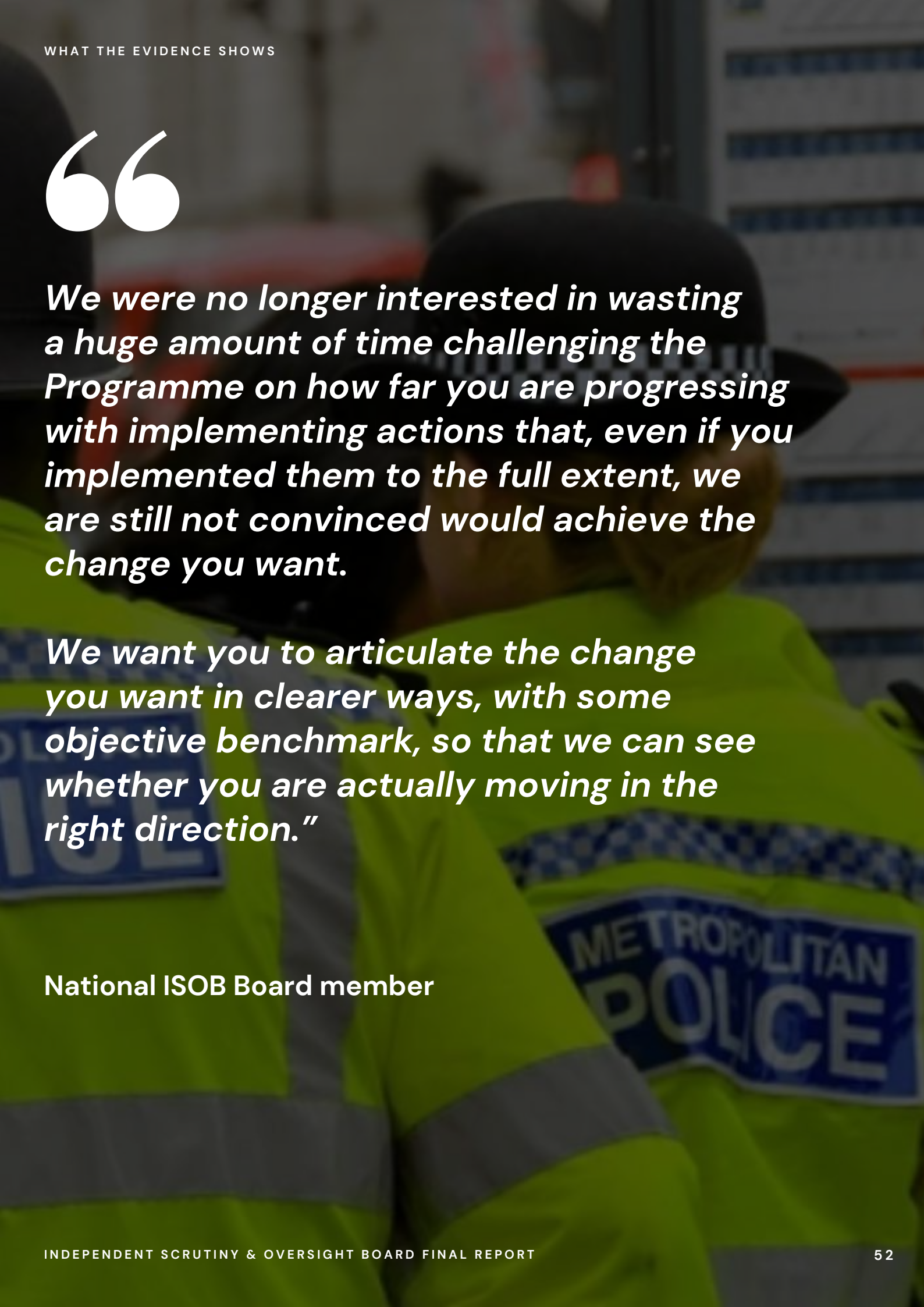
A regional ISOB chair overseeing a force area with diverse urban and rural communities reported similar challenges. Stop and search disproportionality varied significantly across the

area, aligning with the population in some locations and differing greatly in others. Without detailed local data, the scrutiny board could not identify the variations it needed to address.

At the intersection of race with other characteristics, the data picture was almost universally absent. Gender, disability, class, and sexual orientation: across virtually every force area covered by contributors to this report, data at these intersections simply did not exist in any usable form.

Without intersectional data, it is not possible to identify the people experiencing the greatest harm, to design responses that reach them, or to hold policing to account for what it does or does not do for them.

> ***Our position is that anti-racist policing has to be practical, and that means the routine collection, retention and independent scrutiny of fully disaggregated ethnicity data across all police contacts. Without it, the work just lacks direction."***
>
> Civil society organisation, national



*We were no longer interested in wasting a huge amount of time challenging the Programme on how far you are progressing with implementing actions that, even if you implemented them to the full extent, we are still not convinced would achieve the change you want.*

*We want you to articulate the change you want in clearer ways, with some objective benchmark, so that we can see whether you are actually moving in the right direction."*

National ISOB Board member

## Trust

Across the interviews, it was noted that too often, policing has approached the deficit of trust between itself and Black communities as if it were primarily a question of how policing presents itself or communicates. However, trust is not built merely through communications. It is built through changed behaviour, sustained over time, and validated by the experience of the people on the receiving end.

This pattern has been documented for decades. When policing institutions view community engagement as managing perception instead of sharing power, the results are predictable.

The lack of trust between Black communities and UK policing is longstanding. It stems from decades of discriminatory practices, unaddressed deaths in custody, generational experiences of harassment, and repeated unfulfilled promises of reform. Understanding this history is essential for anyone engaging with policing on anti-racism.

The chair of a regional scrutiny body described living on both sides of this history: knowing what it is to have experienced harm at the hands of policing, and now sitting on a body charged with holding that same institution to account. They spoke of pockets of genuine progress in how their local force had approached community engagement during periods of civil unrest, but was careful to frame these as waypoints rather than destinations.

> ***"There are over forty years of the Black community's contact with the police and the journey we have been on. Stephen Lawrence is still something we talk about on a regular basis. That historical factor needs to be factored into everything."***
>
> Regional scrutiny chair

The geography of trust matters too. A member of a scrutiny panel in a predominantly white, northern force area described the psychological dimension of the context with particular clarity. For Black people living in areas where they are visibly in a small minority, and where the authority figures most visible to them are police officers who may have little experience of engaging with Black communities, the dynamics of trust and power are shaped in specific and damaging ways.

The rise of movements associated with white identity politics, such as the race riots in the summer of 2024, and specific incidents in which police were seen to facilitate rather than challenge racially charged public activity, compounded an already difficult landscape.

> ***"When you are in a situation where you see white majority people who occupy places of power, you tend to have that sense of distrust for anyone who is white and in a position of authority. Unless you have that as a daily experience, you will not understand the impact it has."***
>
> Regional scrutiny panel member

Dorset presented a striking case study in what becomes possible when a force is willing to follow the evidence wherever it leads. The force that had for years produced the highest outlier figure for stop and search disproportionality in the country: a Black person in Dorset was fourteen times more likely to be stopped and searched than a white person.[48] This had been known for years. What changed was a willingness to look directly at that statistic and ask honestly what was producing it. That process, supported by community members working alongside police staff, eventually led the force to formally declare itself institutionally racist in October 2024.

What followed from that declaration was as significant as the declaration itself. The force opened internal meetings and training sessions to community members. Officers in the intelligence team began pushing back on suspect descriptions that were racially coded in ways a white suspect's description would not be, having been confronted directly with what those descriptions communicated and having spoken with people who had experienced the reality on the receiving end of them.

> ***"One of the revelations that has been really powerful is that some of the team realised they have no links or communication with Black people at all outside of their work. So all their impressions are based on their job. Every day, if you are just talking about Black suspects, it builds your bias. By having those conversations, it really made them start to think differently."***
>
> Regional scrutiny panel member

Trust is also an internal issue. Black officers and staff within policing report experiences of discrimination, marginalisation and tokenism that undermine the credibility of external-facing commitments to race equity. An organisation that is not trusted by its own Black employees cannot plausibly claim to be building trust with Black communities.

The internal culture that shapes how Black officers are treated is the same culture that shapes how Black members of the public are treated.

## Performative engagement

Policing's approach to accountability is largely punitive and compliance-driven, while community accountability in Black and minority ethnic communities often focuses on transformative justice and harm reduction. These models are not complementary and

reflect fundamentally different views of scrutiny and accountability. This divergence restricts the potential for meaningful engagement and helps explain the persistent presence of performative engagement throughout the PRAP's existence.

One key finding from the evidence gathered for this report is how people from different backgrounds described the same issue. They all noticed that while there is a lot of activity around policing and race, the results are limited.

Interviewees pointed out that even though there are meetings and consultations, the daily lives of Black communities have not really changed.

Several interviewees called this performative engagement. They said these actions are meant to show that policing is doing something, but they do not lead to real, measurable improvements. In many cases, the people involved in designing and running these

processes are genuinely committed. However, the design of the engagement and the institutional context in which it operates means that the process becomes a substitute for the outcome rather than a pathway towards it.

> ***What really annoyed me last year was putting a 45-minute meeting in a diary so we can just sort of catch up, and we can bring you up to speed. You're like, you're absolutely wasting my time, because it's just a lot of chat. We've been having this same chat literally for years now, and nothing has come of it."***
>
> CEO of a civil society organisation

A member of a regional scrutiny board described a process that had good working relationships and genuine dialogue, but no real feedback loop. The board would give feedback, move to the next session, and never find out whether anything had actually improved. Without accountability, engagement creates the appearance of scrutiny while insulating the institution from its consequences.

Another former chair of the same board clearly described the power dynamic behind this pattern. When the board asked for data to support their challenge, they were reminded of their terms of reference. When she asked to observe how the Chief Constable handled internal talks about racism, her request was denied. In her experience, policing sets up scrutiny bodies on its own terms and within its own limits, and treats any challenge beyond those limits as a breach of procedure instead of a valid act of independent oversight.

> ***"From external agencies and communities, they want to see outcomes. They want to see change. From inside the organisation, there is resistance. Whatever the top layer might be saying, the proof of the pudding is always in how it is implemented at the coalface."***
>
> Former Chair of a regional scrutiny board

An independent anti-racism researcher and consultant with sustained experience in large police institutions offered a sharp account of performative engagement. She described being approached by a force seeking her public profile and expertise to signal to Black community members and officers that they were serious. Once that signal was sent, the engagement shifted. The institution wanted credibility without the discomfort her analysis required.

> ***"They wanted proximity to me to be able to convince Black community members and Black police officers they were serious about this work. Just by having me involved in anything gives a layer of credibility. The institution knew that. And when my analysis started to demand real change, the engagement broke down."***
>
> Anti-racism researcher and consultant

A racial justice research organisation described watching engagement events at which substantive concerns were raised, acknowledged, and then not acted on. Police would tick a box saying civil society had been listened to, with no real engagement with what was being said and no outcome orientation.

The distinction between genuine and performative engagement is not always obvious from the outside. Both involve meetings, documents, action plans and public commitments.

The difference lies in who has power in the process, what happens to the feedback generated, and whether the outcome is a change in what policing actually does or simply a record of the conversation.

Power dynamics are central to this issue. Community organisations and individuals engaging with policing on anti-racism do so from a position of structural disadvantage. They have fewer resources, less institutional power, and more at stake personally than the policing professionals they engage with. A senior policing professional who spent several years working on race equity inside a force described engaging with policing as a "bruising, very difficult thing to do."

Policing's dominant engagement model is "show and tell," not co-production. Communities are informed about what the police are doing and invited to respond. Communities and civil society groups have learned to distinguish this from genuine influence. Participation has declined accordingly, and trust continues to erode.


> ***Individuals associated with our organisation were involved in a consultation, but he (officer) was asked not to use our organisation's name.***
>
> ***Months later it becomes clear he has said he has consulted with our organisation's name to validate himself as an expert in open court, while the feedback given by individuals during the consultation have not been taken on board."***
>
> Racial justice research organisation

## The missing lens of intersectionality

**Race does not operate in isolation.**

The experience of a Black woman is not simply being Black plus being a woman. It is a distinct experience, shaped by the interaction of those identities and often producing specific forms of harm that neither a race-only nor a gender-only lens can capture. The same is true for Black people who are disabled, LGBTQ+, young, elderly, living in poverty, or experiencing mental health issues. This is what intersectionality describes: the way different aspects of identity overlap and interact. It acknowledges that people's lives are not neatly divided into separate categories, and that approaches treating them as such will miss those experiencing the greatest harm.

Across the regional scrutiny boards, civil society organisations and community groups that contributed to this report, intersectionality emerged as a consistent and significant gap in policing's approach to race equity. Workstreams operated in silos. Race was addressed separately from other characteristics. The people falling through the gaps between those silos were often the ones who most needed the work to reach them.

In June 2024, the Black Equity Organisation and Fawcett Society jointly published *Public Harms: Racism and Misogyny in Policing, Education and Mental Health Services*, documenting experiences that a single-lens approach to either race or gender would have missed.[49] These included Black women experiencing mental health crises and being criminalised instead of supported, Black women who were victims of violence receiving a different quality of response from policing, and Black women whose multiple disadvantages left them particularly exposed to harm. A separate organisation has also

> ***"The aspect that was not done well, and I think this was across the board, was intersectionality. Time and again we had to pick that up and say: well, how does that fit with this? It was clear they were working almost in silos."***
>
> Regional ISOB member

consistently raised concerns about the adultification of Black children and its connection to school exclusion, criminalisation, and the way young Black people are perceived and treated by institutions, including policing.

The implications for how anti-racism engagement with policing is designed are significant. Consulting with the Black community as if it were a homogeneous group produces insights relevant to some and invisible to others. Data collection that records race but not gender, or race but not disability, shows part of what is happening and misses where the greatest inequalities are concentrated. Frameworks that address racial disproportionality as an isolated issue fail to change the experiences of those whose lives are shaped by the interaction of race with other aspects of their identity.

> ***We try to highlight to people doing race work that children need to be looked at in their own right, because that is a gap. Racialised children, often Black children, end up being subsumed into adult-focused reform. You can't refer to a child as a young person or a young woman. It's a child. Children and adults are often conflated. We spend a lot of time simply pointing that out."***
>
> Children's advocacy organisation

# Recommendations

## What needs to happen next, and who needs to make it happen

### For Government and the Home Office

The most significant structural gap identified by this report is the absence of meaningful accountability for race equity in policing. Without an enforceable inspection framework, all other efforts remain dependent on individual goodwill and vulnerable to changes in personnel and political priorities. Addressing this gap is the most important single thing the government can do to support the continuation of this work.

**Recommendations**

1. Ensure that there is a Home Office backed independent scrutiny function incorporated into police reform.

2. Establish and fund a national centre of expertise on race equity in policing, responsible for collecting and publishing national data, supporting regional scrutiny bodies, and maintaining the community of practice developed through the Police Race Action Plan.

3. Coordinate a review of the Maturity Matrix to ensure that it is fit for purpose.

4. Follow through with the stated commitment to incorporate PRAP metrics into the new Police Performance Framework.

5. Establish an annual data requirement on all police forces to produce, publish and implement the independently verified data in line with the Maturity Matrix's outcomes.

6. Direct His Majesty's Inspectorate of Constabulary and Fire and Rescue Services to develop and apply a specific race equity inspection framework, covering the anti-racism commitments of PRAP through a toolkit such as the Maturity Matrix, with the authority and resourcing to inspect forces annually and publish findings in full.

7. Ensure that the transition of the central PRAP to local forces includes a clear, funded plan for the continuation of the four workstreams, with named accountability at the force level and national coordination to maintain consistency.

8. Require Police and Crime Commissioners to include race equity performance in their annual governance reports to Police and Crime Panels, with specific reference to progress against the Maturity Matrix. From 2028, Mayors and Police & Crime Boards should factor in race equity performance and progress against the Matrix as part of their governance and scrutiny of police forces.

## For the National Police Chiefs' Council and College of Policing

**Recommendations**

9. Commit to completion of the Maturity Matrix in all 44 forces, with outcomes publicly reported, independently verified, and formally linked to force inspection grades.

10. Establish national standards for community engagement within policing that define clearly what genuine, co-designed community engagement looks like and distinguish it from consultation and information-sharing.

11. Create and resource a national framework for regional scrutiny bodies, providing guidance, peer support to prepare individuals for scrutiny, quality assurance, and minimum resourcing standards.

12. Commission the development of a national anti-racism curriculum for career length policing that explicitly addresses structural and institutional racism.

13. Commit to publishing and evaluating disaggregated data on stop and search, use of force, misconduct proceedings, workforce representation, and community trust. This should be broken down by race and by the intersection of race with other relevant characteristics, annually and proactively and comparable across local police forces.

14. Commit to reviewing and understanding the work that has been developed to deliver anti-racism in policing, including, for example, Dr Shereen Daniels' 30 *Patterns of Harm* Report.

15. Commit to implementing mechanisms at force level that provide protected time for all staff and officers to undertake anti-racism reading, training and implementation.


## For future scrutiny bodies

**Recommendations**

16. Define, publicly and specifically, the outcomes you are seeking to drive and the metrics by which you will assess whether they are being achieved. Be prepared to revise those metrics as you learn more, but resist pressure to replace outcome metrics with activity metrics.

17. Insist on access to granular, disaggregated data as a condition of meaningful engagement. If the data you need does not exist, make its development a priority and a public ask.

18. Ensure that community groups, civil society organisations, and anti-racism experts form your body. Defer to their wisdom and create space for their involvement.

19. Maintain independence robustly. The value of an independent body lies precisely in its willingness to resist those pressures.

20. Use public reporting, media engagement and political channels actively as tools of accountability, not as last resorts. The reputational pressure generated by honest public reporting is one of the most effective levers available in the absence of statutory powers.

21. Support and advocate for the resourcing of regional scrutiny bodies, and share learning and methodology generously.

22. Consistently read and absorb material from anti-racism experts, civil society and communities. Ensure you are given sufficient time to read and review relevant material before meetings.

# Glossary

**Adultification** - A form of discrimination where children, particularly Black children and those from minority ethnic backgrounds, are seen as older, more responsible, or less innocent than their peers. This can result in reduced safeguarding and harsher treatment by police and other institutions.

**Angiolini Inquiry (The)** - The Angiolini Inquiry is an independent investigation into the 2021 abduction, rape, and murder of Sarah Everard by a serving Metropolitan Police officer, chaired by Lady Elish Angiolini. It examines failures in police vetting, culture, and power abuse, recommending significant improvements to protect women and restore public confidence.

**Baroness Casey Review (The)** - The Casey Review is an independent investigation into the standards of behaviour and internal culture of the Metropolitan Police Service, led by Baroness Louise Casey. It was commissioned following widespread public concern after the murder of Sarah Everard. The review began in February 2022 and completed in March 2023, and found institutional racism, sexism, and homophobia in the Metropolitan Police.

**Benchmarking** - evaluating (something) by comparison with a standard.

**Civil society organisation** - According to the World Bank, civil society refers to "a wide array of organisations: community groups, non-governmental organizations [NGOs], labour unions, indigenous groups, charitable organizations, faith-based organizations, professional associations, and foundations."

**College of Policing** - The College of Policing (CoP or "the College") is a professional body for everyone working across policing. It is an operationally independent non-departmental public body.

**Dashboard** - Dashboard reporting is a visual representation of your company's key performance indicators (KPIs). Using data from other reports, dashboard visuals provide charts and graphs to give an at-a-glance vision of your company's performance.

**Disproportionality** - When something is too large or too small when compared with something else. In policing, this usually means when a group is impacted by police powers (e.g. stop and search, use of force) at a rate higher than their representation in the general population.

**Diversity** - In the workplace, diversity focuses on the composition of a staff — demographics such as gender, race/ethnicity, age etc.

**Equality** - Each individual or group of people is given the same resources or opportunities.

**Equity** - Recognises that each person has different circumstances and allocates the exact resources and opportunities needed to reach an equal outcome.

**Inclusion** - A measure of culture that enables diversity to thrive.

**Indirect discrimination** - When a policy that is applicable to everybody, disadvantages a group of people who share a protected characteristic.

**His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)** - HMICFRS oversees, inspects and reports upon the efficiency and effectiveness of all Home Office police forces, as well as other forces and agencies by invitation.

**Intersectionality** - A way of understanding how different aspects of a person's identity (e.g. race, gender, class, age) combine to create unique experiences of discrimination or privilege.

**The Independent Office for Police Conduct (IOPC)** - oversees the police complaints system in England and Wales. It investigates the most serious matters, including deaths following police contact, and sets the standards by which the police should handle complaints. It is independent, and makes its decisions entirely independently of the police and government.

**Stephen Lawrence Inquiry** - On 22 April 1993, Black British teenager, Stephen Lawrence, was murdered in an unprovoked racist attack. An Inquiry into his death and the Metropolitan Police's response was led by the late Sir William Macpherson. The Inquiry, and subsequent report published in February 1999, found institutional racism in the Metropolitan Police, as well as major failings in its investigation and in the way Stephen Lawrence's family and his friend Duwayne Brooks were treated.

**Maturity Matrix** - A Maturity Matrix is a self- assessment tool to help the organisation understand the extent to which it has developed or implemented. In policing, it is a national self-assessment tool used by police forces to evaluate their progress against anti-racism commitments. Forces are expected to evidence change across multiple dimensions.

**National Black Police Association (NBPA)** - Established in 1998, the NBPA is a national umbrella body representing Black Police Associations from across UK forces. It works to improve the working environment for Black officers and staff, influence national policy on race equality, and strengthen trust between policing and Black communities. Its membership includes local BPAs from across England and Wales, with around 5,000 officers, staff, and civil servants represented.

**National Police Chiefs' Council (NPCC)** - Brings together senior police leaders in the UK to set direction and strategy across policing.

**Police and Crime Commissioners (PCCs)** - PCCs are directly elected politicians who are responsible for securing an "efficient and effective" police force for their area. A PCC represents every police force area in England and Wales with the exceptions of London, Greater Manchester and West Yorkshire where the powers of the PCC are held by an elected mayor. PCCs have several key functions, including appointing a chief constable, holding them to account, and if necessary, dismissing them.

**PEEL Assessments** - Police effectiveness, efficiency, and legitimacy (PEEL) assessments are independent reviews of police forces in England and Wales, carried out by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). They examine how effective, efficient and fair each force is, using inspections, data and professional judgment. Forces are graded from outstanding to inadequate, giving the public a clear picture of policing performance.

**Practice Bank** - A shared collection of real-world examples, guidance, and tools, hosted by the College of Policing, designed to help forces adopt effective or promising approaches to policing challenges.

**Racial disparity** - Differences in outcomes between racial or ethnic groups, often reflecting underlying structural or systemic inequalities. In policing, this includes, but is not limited to, disparities in stop and search, use of force, and workforce progression.

**Racism** - Consists of conduct or words or practices which disadvantage or advantage people because of their colour, culture, or ethnic origin.

**Section 60 Super Complaint** - In 2021, the Criminal Justice Alliance (CJA) submitted a super-complaint in calling for the repeal of Section 60 of the Criminal Justice and Public Order Act 1994, a power that allows police to stop and search people without reasonable suspicion in designated areas. The complaint was submitted to HMICFRS, and argued that Section 60 disproportionately impacts Black communities, worsens trust in policing, and is less effective than other stop and search powers. While HMICFRS did not accept the central case for repeal, their inquiry recommended stronger adherence to legal and voluntary safeguards around Section 60. The CJA continues to work with HMICFRS on these improvements.

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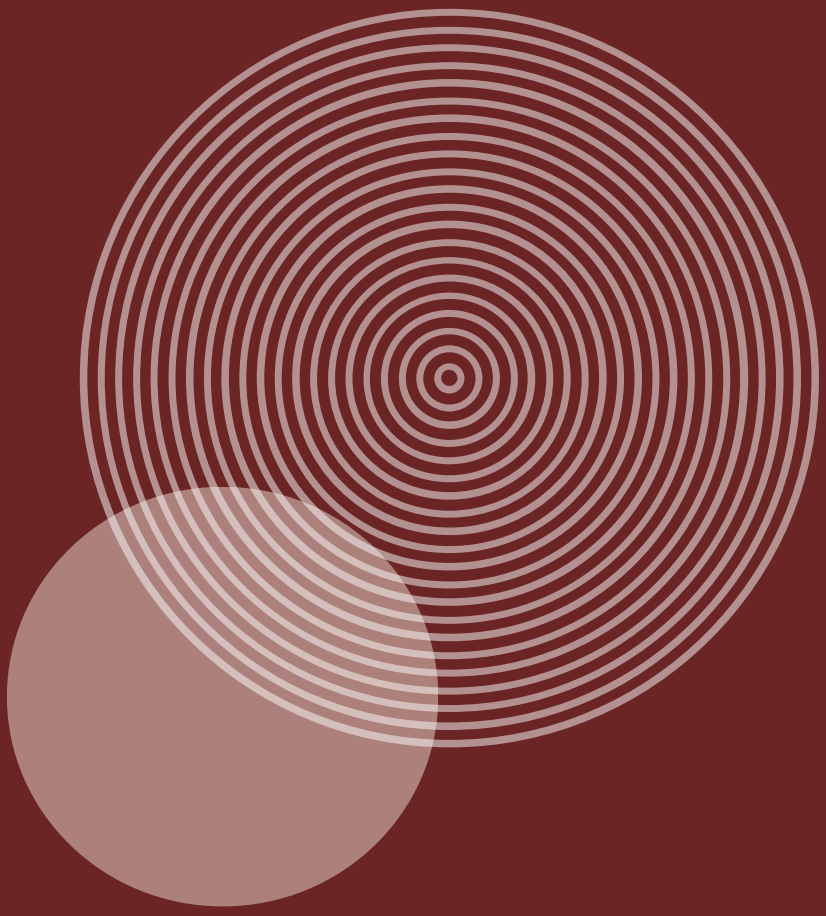

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