

INDEPENDENT
SCRUTINY &
OVERSIGHT
BOARD

POLICE RACE ACTION PLAN: INDEPENDENT SCRUTINY AND OVERSIGHT BOARD ANNUAL REPORT

May 2022 - May 2023

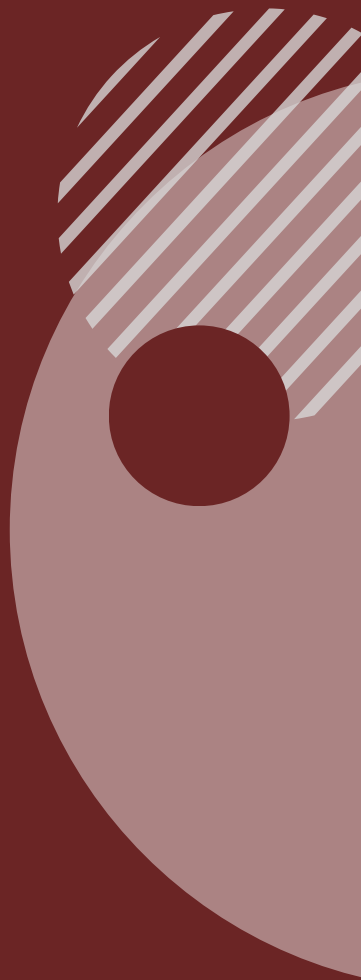
August 2023





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01

FOREWORD



Desmond Brown

Independent Chair of
Community Scrutiny
Oversight Board, Avon &
Somerset CJS

The publication of the Police Race Action Plan is the most significant recognition by UK policing of the continued traumatic legacy of its contact with Black communities in England and Wales, since the Stephen Lawrence Inquiry Report in 1999.

The report led to a flurry of announcements by successive Governments and to some changes in policing on how institutional racism should be responded to and on the treatment of racist crime. These changes have been slow and have had limited impact for Black communities on the ground.

Despite support for the principle of Stop & Search, Black adults have deep misgivings about the way the powers are used.¹

36% of Black children and teenagers trust the police compared with 75% of white children and teenagers.²

My report, *Identifying Disproportionality in Avon and Somerset Criminal Justice System*,³ found that in 2019/20, Black people were 10 times more likely to be stopped and searched for drugs than the white population. In a staggering 63% of these searches, no objects were found, with most of the searches officer-led, rather than intelligence-led.

The failure of the UK's 44 Police Chiefs in 2022 to make a public admission that their forces were institutionally racist further alienated Black communities' already shattered trust and confidence in UK policing.

This reluctance to admit institutional racism emphasises, "the comfort of the wrong people over the experience of black people."⁴ This highlights suspicions that the Plan's stated aim of making policing anti-racist is nothing more than performative. 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?

In Avon & Somerset, however, Chief Constable Sarah Crew and her senior leadership team have acknowledged that the elephant is sitting in the room.

In June 2023, she made the public admission that Avon & Somerset Constabulary (ASC) was 'Institutionally racist', promising to add tangible actions alongside the principles of Lammy's 'explain or reform'.

Under Sarah Crew, ASC seeks to continue engaging courageously in real dialogue both internally and with external stakeholders from Black communities and beyond.

There is a recognition that it is no longer enough to *not* be racist. ASC must become an actively anti-racist organisation that Black people can trust for "without trust, there is no consent and without consent, we no longer have the legitimacy to police."⁵

The challenge for the Race Action Plan is to create a police service that is truly anti-racist. This cannot be achieved through activity and simple box-ticking exercises alone. As David Lammy said whilst giving evidence to the then House of Commons Justice Committee, on the progress of his report in March 2019, "I detect a lot of activity, but activity should not be confused with meaningful and measurable outcomes on the ground"⁶

Public commitments need to be made into measurable targets and success measures that can demonstrate tangible changes in policing on the ground and in communities as a result of it.

To that end, ASC has set up two local Independent Community Scrutiny Oversight Boards, one for the Plan and the other for the wider issues outlined in my ID report, aiming to objectively challenge and promote good practice.

The ISOB's seven further recommendations within this report point to clear solutions to many of the concerns raised about the Plan, providing the NPCC and the College an opportunity to deliver an effective anti-racist action plan.



No one said this has or will be easy, it is hard, and the learning and change required is painful. Nevertheless, the injustice is clearly visible and evidenced. Denial or 'neutrality' is not an option.

¹ [Crime, policing and stop and search: Black perspectives in context](#), Crest Advisory, November 2022 [Internet, last accessed July 2023]

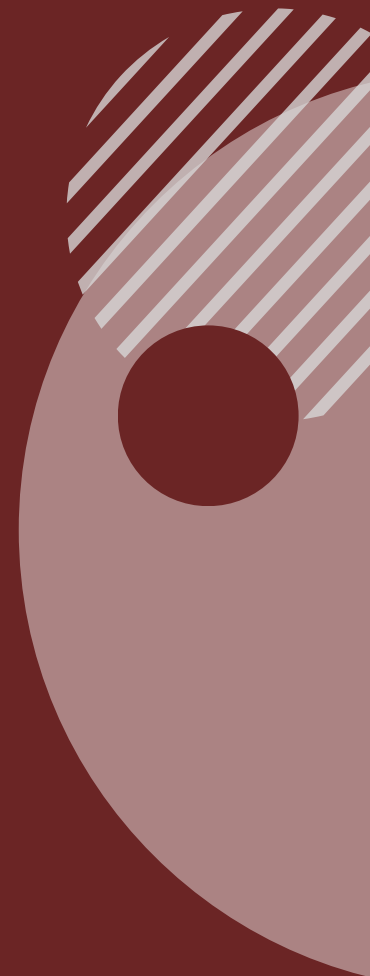
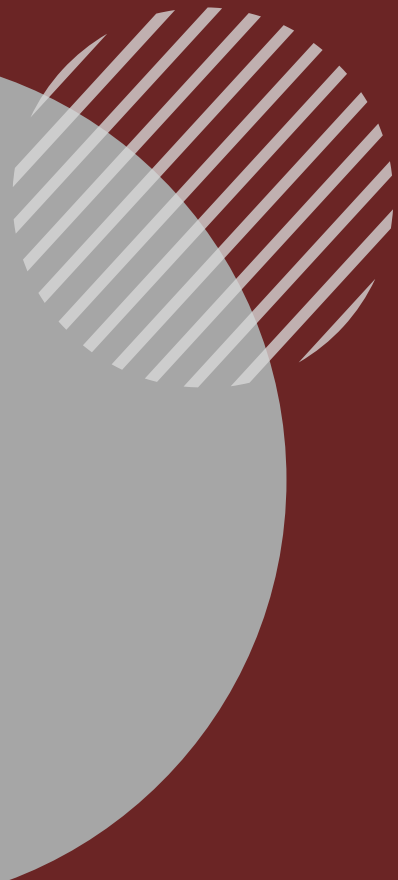
² [Forgotten voices: Policing, stop and search and the perspectives of Black children](#), Crest Advisory, November 2022 [Internet, last accessed July 2023]

³ [Identifying Disproportionality in Avon and Somerset Criminal Justice System](#), Avon & Somerset Criminal Justice Board, March 2022 [Internet, last accessed July 2023]

⁴ [UK police chiefs consider public admission of institutional racism](#), The Guardian, 12 December 2021 [Internet, last accessed July 2023]

⁵ [Chief Constable Sarah Crew on becoming an anti-racist police service](#), Avon & Somerset Police, May 2022 [Internet, last accessed July 2023]

⁶ [Progress in the implementation of the Lammy Review's recommendations](#), House of Commons, 26 March 2019 [Internet, last accessed July 2023]



02

INTRODUCTION & CONTEXT

2020

- June 2020 **Race Action Plan announced**
- Nicole Smallman and Bibaa Henry found murdered in Wembley
- Met police twice as likely to fine Black people over lockdown breaches
The Guardian
- July 2020 Athletes Bianca Williams and Ricardo dos Santos stopped and handcuffed whilst baby in the car
- August 2020 Labour MP Dawn Butler stopped by police
- October 2020 7th Lamont Roper drowns in the River Lea following a MPS pursuit in Tottenham
- December 2020 16th Avon & Somerset police use PAVA spray on a Black mother in close proximity to her toddler after a dispute over a bus ticket escalates. Independent panel subsequently finds the use of force to be disproportionate. Findings accepted by police.

2021

- April 2021 1st 14 Year old Black boy punched and kicked by Met police officers during arrest
- 6th 17-year-old Ronaldo Johnson dies as a result of injuries sustained during a pursuit by GMP
- 13th Met Police officer Charlie Harrison jailed for breaking a Black man's knee in a 'clear case of racial profiling'
- National Stop and Search Learning Report
Independent Office for Police Conduct
- May 2021 18-year-old Devonte Scott dies as a result of injuries sustained during a pursuit by GMP
- June 2021 West Mercia Police officer sentenced for the manslaughter of Dalian Atkinson
- July 2021 The Macpherson Report: Twenty-two years on
The Home Affairs Committee
- August 2021 Abimbola Johnson appointed Chair of the ISOB
- Review of IOPC cases involving the use of Taser 2015-2020
Independent Office for Police Conduct
- October 2021 Update on IOPC thematic focus on race discrimination investigations
Independent Office for Police Conduct
- December 2021 Met Officers Jamie Lewis and Deniz Jaffer jailed for taking and sharing photos of Nicole Smallman and Bibaa Henry

2022

- February 2022 Operation Hotton Learning Report published
Independent Office for Police Conduct
- March 2022 1st Local Child Safeguarding Practice Review Child Q
Independent Office for Police Conduct
- May 2022 1st First iteration of the Plan published
- May - August 2022 Police Race Action Plan Public Survey runs
- June 2022 1st ISOB Members appointed
- 4th Oladeji Omishore dies following contact with two Metropolitan Police Officers on Chelsea Bridge, following multiple taser use
- 30th Six police forces in England placed in special measures
- July 2022 3rd Godrick Osei dies after restraint by police
- August 2022 5th Research finds police racial bias in UK Covid fines regime
University of Liverpool
- 8th Strip search of children by the Metropolitan Police Service
Children's Commissioner for England
- 24th Mixed race 16 year old girl beaten and strangled by arresting officer
- September 2022 5th Chris Kaba fatally shot by Metropolitan Police Officer
- October 2022 26th State of Black Britain Report
Black Equity Organisation
- 11th Met stop recording ethnicity of drivers stopped by its officers
- 17th Baroness Casey Report on Misconduct in the Metropolitan Police
Baroness Casey Review
- Merseyside officer, PC James Ennis, quits after mistakenly recording himself shouting racist abuse at his TV during a news report featuring a Black person
- November 2022 8th Crime, policing and stop and search: Black perspectives in context
Crest Advisory
- 11th Met to overhaul 'racist' gangs matrix
- IOPC launches probe into Gwent Police after racist, sexist and homophobic WhatsApp messages shared by dozens of officers are found on a deceased officer's iPhone
- December 2022 1st Forgotten voices: Policing, stop and search and the perspectives of Black children
Crest Advisory
- 15th Black Workforce Survey
NPCC
- Six officers from the Metropolitan Police, Norfolk Constabulary and Civil Nuclear Constabulary lose jobs for being part of offensive WhatsApp groups which shared grossly offensive messages

2023

- January 2023 16th Over-policed and under-protected The road to Safer Schools
Runnymede Trust
- UN Working Group of Experts on People of African Descent declares racism in UK is "structural, institutional and systemic"
- February 2023 10th Police Race Action Plan survey results published
- 20th I Can't Breathe: Race, Death & British Policing
INQUEST
- March 2023 1st Death of PC Anagram Abraham after allegations of bullying at work
- 7th The Ethnicity of Missing People
Missing People
- 21st Baroness Casey Review Final Report
Baroness Casey Review
- 23rd IOPC makes referral to the Crown Prosecution Service over fatal shooting of Chris Kaba
- April 2023 6th Strip search of children by the Metropolitan Police
Liberty Investigates
- 19th Police Federation Chair accepts Met is institutionally racist, sexist and homophobic
- 22nd 30th Anniversary of the death of Stephen Lawrence
- 25th Release of 'Holding our own: a guide to non-policing solutions to serious youth violence'
Liberty
- 27th Strip search of children in England and Wales
Children's Commissioner for England
- May 2023 9th Met police put spit hood on 90-year-old woman and pointed Taser at her
- BBC Newsnight reports that former personnel working on the Police Race Action Plan experienced racism in their roles
- June 2023 9th First SVRO in the country issued
- 16th Police in West Yorkshire schools more likely to use force against Black kids
Open Democracy
- 19th Stop and search: Suella Braverman urges forces to 'ramp up' measure
- 26th Stephen Lawrence: BBC names new suspect in UK's most notorious racist murder
- 29th Inquiry finds 'Spycops' operations to be unjustified
- 30th Black youth worker Tasered by police loses claim for damages
- July 2023 5th Police watchdog forced to apologise after court overturns clearance of officer who punched Black pensioner
- 6th Four retired detectives who ran the first Stephen Lawrence murder investigation will not face criminal charges for their actions in the case
- 15th Unnamed Black man dies following contact with the Metropolitan Police in Croydon
- 19th Alliance for Police Accountability launched
- 21st Video circulates of Black woman handcuffed by Metropolitan Police in front of her child in Croydon after dispute over bus fare
- 26th Met Police officers investigated after Black woman, 90, handcuffed and put in spit hood
- 27th Asian woman claims she was drugged and sexually assaulted by Greater Manchester Police

KEY

- Police Race Action Plan
- Reports
- Significant Event

TIMELINE OF EVENTS SINCE ANNOUNCEMENT OF THE POLICE RACE ACTION PLAN



Abimbola Johnson

Chair, Independent Scrutiny & Oversight Board

The Police Race Action Plan (“the Plan”) was announced by the National Police Chiefs’ Council (“NPCC”) and the College of Policing (“the College”) in June 2020 following the racist murder of George Floyd by serving American police officer Derek Chauvin.⁷ Announced with much fanfare, the Plan aims to improve policing for Black people by building an anti-racist police service.

The task of the Plan cannot be underestimated. Since its announcement, there have been at least nineteen significant policing-related reports or incidents that have all highlighted that racism in policing is as present now as it was in 1999 when the landmark Stephen Lawrence Inquiry found institutional racism in the Metropolitan Police.

This invokes one of the difficulties in delivering this programme of work. Although the Plan is slated as one national programme, it is in effect 44 different local programmes of work that need equal and considered delivery by every police force across England and Wales in order to be truly successful.

The Policing Protocol Order 2011 which established the Office of the Police and Crime Commissioner specifically states that:

“[t]he establishment of PCCs has allowed for the Home Office to withdraw from day-to-day policing matters, giving the police greater freedom to fight crime as they see fit, and allowing local communities to hold the police to account.”⁸

The devolved nature of accountability structures in policing means that the delivery of the Plan is dependent on the consensual dedication of police chiefs and PCCs to deliver it.

More broadly, there is a lack of alignment between the goals of the Plan and that of the Home Office. Although representatives from the Home Office sit on the Programme Board for the Plan, the programme is not in receipt of any funding from central government.

Furthermore, rhetoric driven by the Home Secretary is undermining the efforts behind a programme of work like the Plan.

In November 2022, when addressing the National Police Chiefs’ Council and Association of Police and Crime Commissioners’ Summit, Home Secretary, The Rt Hon Suella Braverman KC MP, rallied against “politically correct distractions” and “woke policing.”

She wrote to chief constables, encouraging them to ‘ramp up the use of stop and search’, despite the clear race disparity in the use of such powers.⁹

She endorsed the relaxation of restrictions around the use of suspicionless search powers despite there being a live super-complaint being investigated by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) into the disproportionalities this power manifests.¹⁰

The use of force was also heavily endorsed by the Home Secretary without acknowledgement of associated disproportionality figures.¹¹

Despite these constraints, some forces have demonstrated a real and very public determination to deliver on the commitments outlined in the Plan.

For example, Thames Valley Police has established a local Race Action Plan structure which has included appointing an independent chair of a localised ISOB.¹²

It has held several community engagement events centred around the Plan. Rank and file, senior officers, and community members from the force area frequently attended the forum sessions we ran in 2022. Thames Valley Police leadership has consistently and openly spoken about the importance of the Plan in delivering its ambitious goals. This is not to say that its delivery of the Plan is or will be free of criticism but it appears to be laying the foundations for meaningful work that will be implemented in collaboration with internal and external communities.

Thames Valley Police is not alone, other forces have demonstrated a similar dedication to the Plan. However, a number continue to lack visibility in their delivery of the programme. In some cases, this reflects a lack of leadership and substantive dedication to the programme, in others, there is a need for greater assistance and intervention from the NPCC and the College to guide their journeys.

London’s Metropolitan Police Service (the Met) is key to the Plan.

⁷ *Police Race Action Plan: Improving Policing for Black People*, NPCC and College of Policing [Internet, last accessed July 2023]

⁸ *The Policing Protocol Order 2011*, s27 [Internet, last accessed May 2023]

⁹ www.gov.uk/government/news/police-urged-to-use-stop-and-search-to-save-more-lives, GOV.UK, June 2023 [Internet, last accessed July 2023]

¹⁰ www.criminaljusticealliance.org/blog/cja-calls-for-government-to-repeal-section-60-stop-and-search-power/, Criminal Justice Alliance, 20 May 2021 [Internet, last accessed July 2023]

¹¹ *Speech Suella Braverman at the APCC and NPCC Partnership Summit*, GOV.UK, 9 November 2022, [Internet, last accessed May 2023]

¹² <https://www.thamesvalley.police.uk/police-forces/thames-valley-police/areas/au/about-us/our-commitment/our-race-action-plan/>, Thames Valley Police, [Internet, last accessed 15 May 2023]

Around 44% of England and Wales' Black and Black mixed heritage population lives in London with many more frequenting London to work, study and visit.

The Metropolitan Police holds national portfolios not covered by other forces so the direction it takes has significant influence over national police priorities. It is, therefore, disheartening to see that local implementation of the Plan in London remains in its infancy.

In my time as Chair and as a London resident, I have seen pockets of positive work being implemented by Metropolitan Police officers however these appear to be limited to small areas within London. They are also driven by small and dedicated teams, rather than work that reflects a concerted and consistent effort to implementation across the police force. With the publication of Baroness Casey's October 2022 and March 2023 reports into the force, the latter of which concluded that it is institutionally racist, homophobic, and misogynist, we hope to see a centralised focus on tackling racism in all forms within the Metropolitan Police.

It must also be noted that some police chiefs and leaders who wish to actively deny the existence of institutional racism do so without hesitation. This includes Greater Manchester Police's chief constable Stephen Watson.¹³

By contrast, few appear to be willing to publicly acknowledge its existence although some have done so.¹⁴

When he stated publicly that he did believe institutional racism exists in policing, Steve Hartshorn, Chair of the Police Federation of England and Wales which represents rank and file officers, simultaneously stated that he anticipated he would receive a lot of personal backlash for doing so.¹⁵

When Emily Spurrell, the Police and Crime Commissioner for Merseyside publicly accepted that her force is institutionally racist, her police chief, Serena Kennedy, swiftly issued a statement denying that it was.¹⁶ After Avon and Somerset Police Chief, Sarah Crew, accepted institutional racism in June 2023, her local Federation Chair accused her of creating a *"false narrative."*¹⁷

Interviewed in March 2023, Neil Basu, a former head of counter terrorism, stated that he "[doesn't] trust this generation of chief constables to reverse the problem of institutional racism" when speaking of his experiences of listening to fellow chief officers debate whether to accept the terminology during the establishment of the Plan.¹⁸

Not only is there no uniform acceptance of the existence of institutional racism amongst police leadership, the public backlash felt by those that do accept it only fuels concerns that policing does not embrace or encourage serving officers and staff to speak openly about racism.

This also highlights the need for acceptances of institutional racism to follow and reflect internal work conducted by forces to ready their officers, staff and stakeholders of these announcements.

Delivery of the Plan requires a unique type of leadership in policing. One that can bring together the communities who have been left behind by the institution: under-protected and over-policed both internally and externally; galvanising the senior leadership in policing to tackle this programme of work; support and adequate resourcing; and ensuring that the rank and file in policing, the very officers with whom the public come into contact the most and those who themselves feel the brunt of the shortfalls in policing, are listened to and brought into this work.

We would also like more visible and aligned work between the Plan and the statutory bodies empowered to scrutinise forces against the Plan's anti-racism aims, namely HMICFRS and the IOPC.

Both have representatives who sit on the Plan's Programme Board which meets every two months. However, seeing more direct interaction between the Plan and those agencies would provide a statutory footing against which its progress can be measured.

¹³ [No UK police force is institutionally racist says Chief Constable of Greater Manchester Police](#), LBC News, 19 April 2023, [Internet, last accessed May 2023]

¹⁴ The term was accepted by CC Lucy D'Orsi in May 2022, the current chief of BTP and Workstream lead for Use of Powers in PRAP: [Chief Constable Lucy D'Orsi OPM reflects on the Race Action Plan](#), British Transport Police, 24 May 2022; and had been accepted by (now retired) CC Garry Forsyth of Bedfordshire Police: see ['Institutional racism' exists within Bedfordshire Police, says Chief Constable](#), Bedfordshire Live, 11 June 2021

¹⁵ [Police Federation chair accepts Met is institutionally racist, sexist and homophobic](#), The Guardian, 19 April 2023, [Internet, last accessed May 2023]

¹⁶ [Merseyside police commissioner sparks row with force over 'institutional racism'](#), The Guardian, 5 May 2022, [Internet, last accessed May 2023]

¹⁷ [Avon and Somerset Police must have difficult conversations about racism, but it is not institutionally racist](#), Avon & Somerset Police Federation, 15 June 2023, [Internet, last accessed July 2023]

¹⁸ [Basu: I don't trust police chiefs to reverse institutional racism](#), Eastern Eye, 21 March 2023, Eastern Eye, 23 March 2023 [Internet, last accessed May 2023]

The contents of this report reflect the considerable amount of time we spend reviewing every document and report we have been provided with over our first year (April 2022 - April 2023).



We have spoken to stakeholders and police officers and staff alike. We make force visits; meet with community members, organisations, and interest groups; and regularly attend and observe Plan meetings in their various forms: programme board meetings, “Task and Finish” groups, “ice-breaker force” meetings, as well as meetings with specific national workstream teams responsible for delivery of the Plan.

Last year, we also ran a series of Accountability Forum sessions which were open to members of the public and to the police to better understand how people felt about the Plan and what they would want to see from us as a Board.

There are of course limitations to the insight my Board can ever gain. There are only six of us who occupy these roles on a part-time basis. We have a limited number of hours per month that we can dedicate to our board work.

To an extent, therefore, we are dependent on receiving clear and unfettered information from the Plan team to form our insight into activity; and we have to prioritise our areas of focus to ensure we use our time as efficiently as possible.

As a board, we meet every month to share what we have seen and to ensure that we do not work in silos. Each board member focuses on two or more Plan workstreams to encourage as much cross-working as possible. As expanded upon in the body of this report, some workstreams have been better than others in sharing information with us.

Each Board member is personally committed to seeing an anti-racist police service and remain involved in the Plan because ultimately, we want that central goal to succeed. Having said that, this remains a police programme. One that policing itself must deliver. To that end, we have seven main thematic recommendations that are set out below.

Further on in the report we provide feedback for each workstream. This feedback has been provided in advance of publication to the Programme team and has, for the most part, been received openly with some recommendations already being acted upon to better improve Programme delivery.

Moving forward, we will provide annual updates on the Programme and will continue to publish ad hoc updates as matters progress over the course of this year.

Abimbola Johnson
Chair, Independent Scrutiny & Oversight Board



03

THEMATIC RECOMMENDATIONS



"[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."

**Sir William Macpherson,
The Stephen Lawrence Inquiry Report (1999)**

"Racism is a form of socialised hatred that we must actively unlearn. It requires constant self-reflection and a commitment to dismantling oppressive systems"

**Bell Hooks,
Killing Rage: Ending Racism (1996)**



Ahead of the publication of the final iteration of the Plan, ISOB has the following recommendations:

1

Restructure the Race Action Programme to better reflect an anti-racism programme

The structure of the Race Action Programme is cumbersome. It is hierarchical and closely follows structures that exist within policing itself. This matters because at its core, the Plan is an anti-racism programme, not an operational policing programme. Report after report has highlighted that the structure of policing itself manifests racism and other forms of discrimination.

It is also crucial to ensure that those who are responsible for the Plan are genuinely dedicated to anti-racism work and are adequately supported and resourced in that work.

We have concerns about the level of burden carried by the workstream coordinators, and the frequent changes in personnel, particularly by those who sit at the delivery level and are the most likely to have direct relationships with stakeholders and local forces.

The Plan acknowledges that retention and promotion practices in policing manifest racism, meaning that talented officers and staff of colour are often overlooked, and undervalued by the institution of policing. Therefore, it is important that the Race Action Programme itself is not subject to the same unfairness.

The Programme must flatten its structure to both reduce the number of levels between those in leadership and those tasked with execution, and to better reward talent, dedication, and delivery.

2

Introduce tangible and measurable performance metrics

Actionable and meaningful metrics are missing from the Police Race Action Plan published in May 2022. The provision of clear metrics was a commitment given to ISOB by the NPCC and the College when the Board was being recruited. They assist with providing a baseline from which to measure success and clearer more pragmatic guidance for local forces and community members to consider local activity. We would also recommend that any updated versions of the Plan specifically highlight what reports or inspections it anticipates will cross over with HMICFRS and IOPC work.

These organisations set their priorities and areas of focus years in advance. The Plan should be ready to liaise with them when those strategies are next reviewed.

This will act as a visible reminder to forces that statutory bodies are engaged with inspection against its aims and will further incentivise them to show commitment to implementation. It will also assist members of the public and officers and staff to push for local adoption.

Since providing our feedback regarding actionable metrics, an updated version of the May 2022 Plan outlining further metrics and deadlines has been circulated to each of the 44 police forces. We have fed back to the NPCC that this should be published and that the next iteration of the Plan should centre on those principles.

3

Identify clear areas of focus

The designation of some actions as priorities and the lack of activity in some key areas is a concern. For example, there is no focus on stop and search in the Plan despite this police power being a major driver of mistrust of the police by Black communities due to its racially biased use. These observations are further developed in the workstream specific sections of this report.

Intersectional approaches – as examples, taking into account the unique experiences of Black women and girls, Black people with mental health vulnerabilities, and those who speak English as a second language – are also not as clearly outlined. The Plan must better acknowledge intersectionality to demonstrate a developed understanding of the nuances in the experiences of Black heritage groups in England and Wales.

4

Increase engagement with external stakeholders

A lack of stakeholder engagement has repeatedly arisen during ISOB discussions with the Race Action Programme.

A national survey seeking public, policing, and stakeholder views on the Police Race Action Plan ran between May and August 2022. However, the survey closed with limited qualitative discussion having been undertaken to supplement written survey responses. This was a key area of feedback the ISOB had provided.

We were conscious that the majority of people who come into contact with the criminal justice system are under 25, and further that not everyone is passionate about the implications of racism in policing would feel able to express their views in writing or within the confines of the survey.

The period since the survey closed presented an opportunity for the Plan team to build external stakeholders into the mechanisms of the programme. However, we have not seen evidence of this happening with any consistency, or in some cases, at all. This is in part due to resourcing but has been driven by a lack of consistent prioritisation of engagement by the programme's leadership.

The need for meaningful engagement has been raised time and again by Black communities, and anti-racism and civil society organisations. It has been cited as a reason why they are reluctant to open themselves up to involvement with the police. They do not feel listened to, they raise concerns of being "mined" for information, of their names being listed in publications to state they have been consulted with without demonstrable evidence that the police have truly considered any of their responses.

5

Develop and deliver a clear communications strategy

Much of the work completed in the programme has been insular with limited communication with the public. Key milestones, deadlines, and updates are rarely shared with the public and there are few visible faces associated publicly with the Plan.

When ISOB has raised concerns about communications, frequently the response has been that communication should be left to local forces. Although local forces do have responsibility for implementation, the Plan is still a national programme.

Some communication will of course need to be tailored to local areas such as advertising meetings, local initiatives, and pilots. However, there are clear areas of national ownership for sharing information with different audiences including continued information about the existence of the plan, its commitments, performance metrics, national standards, outcomes of meetings with external stakeholders, and accessible resources for police officers. Access to the Plan information should not be subject to a postcode lottery.

A consequence of poor communication has been that positive pieces of work delivered by the Programme are not within public knowledge. This has a knock-on effect on motivation within the Plan team.

In our feedback to the Plan survey, the ISOB recommended the creation of a Race Action Plan website, regular public updates, and a commitment to the creation of an annual summit on race developed alongside police forces, led by communities and specialist anti-racism organisations. This feedback has been well received with promises made by the Race Action Programme that it will be implemented throughout 2023.

6

Improve the flow of information to the ISOB

The ISOB has limited access to information about local delivery. The Plan uses "Task & Finish Groups" and "ice-breaker" forces to engage with local forces. However, these meetings are limited and are not consistently used across the workstreams. Where they are, there are concerns that the meetings do not provide a platform for open and transparent sharing about challenges and where things are going wrong. If a force does not belong to one of the above meetings, we have little to no understanding of their Plan implementation unless we can find the capacity to organise meetings with them.

Information is not always shared with the ISOB as openly as we would expect. We have never been told who the more problematic/cynical/slow-adopting forces have been. This is information we have to gather through subtext and forming our own observations.

To their credit, when we have been able to engage with local forces directly, we do find more willingness to share lessons, areas with which they struggle and require more support.

This highlights the need to provide safe spaces for reflection and discussion, a factor that again goes to the need for resource in the programme. As a board of professionals, every member has been vetted, and we have agreed to abide by the Nolan principles. Increased candour would assist us in effectively performing our roles.

7

Provide adequate resourcing to the Plan

Resourcing of the Plan has been an ongoing concern and risks undermining the whole of the Race Action Programme.

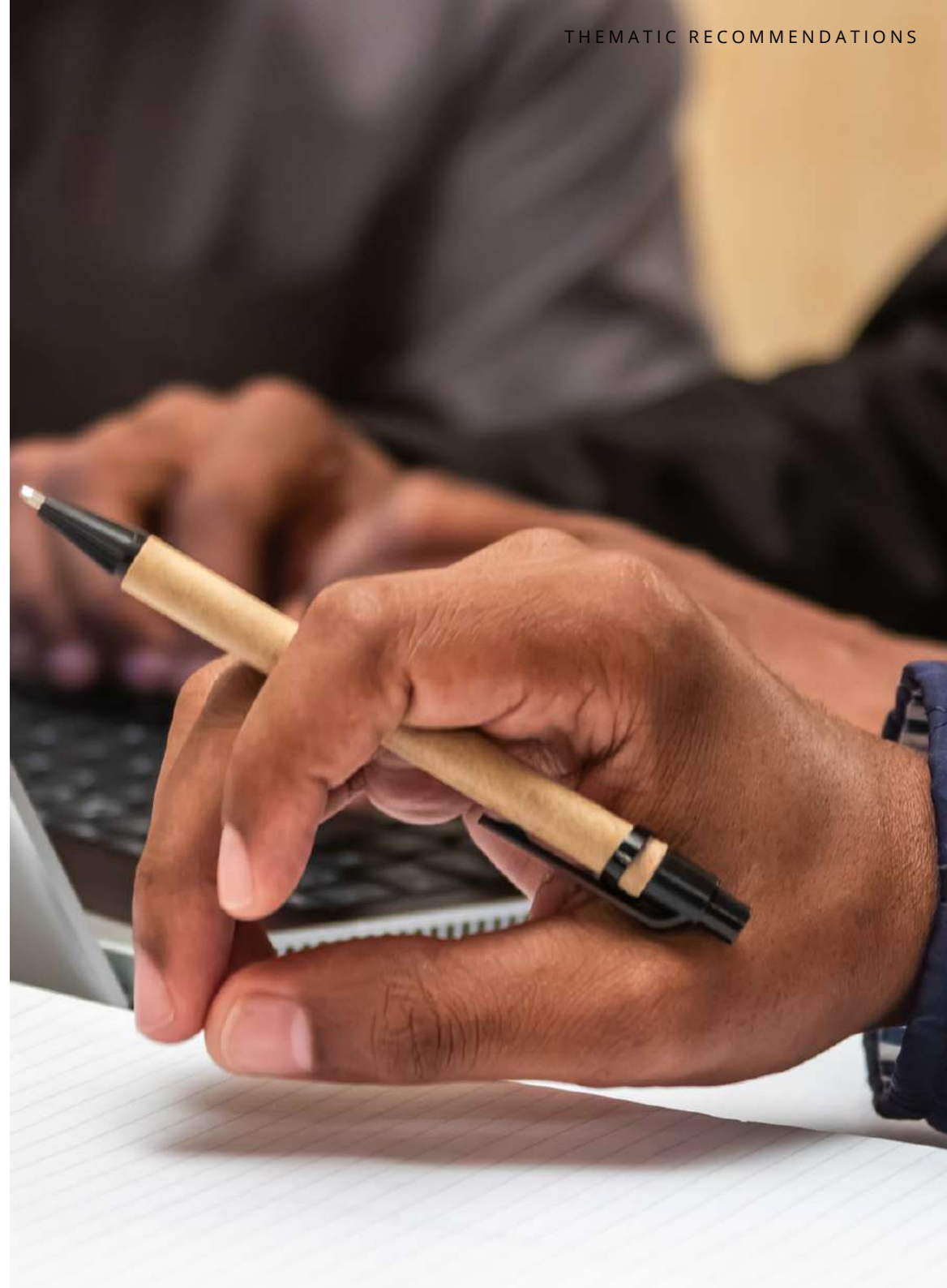
Much of the day-to-day work of Plan implementation falls onto workstream coordinators. To date, they have no individual administrative support despite having wide-ranging responsibilities for the delivery of the Plan.

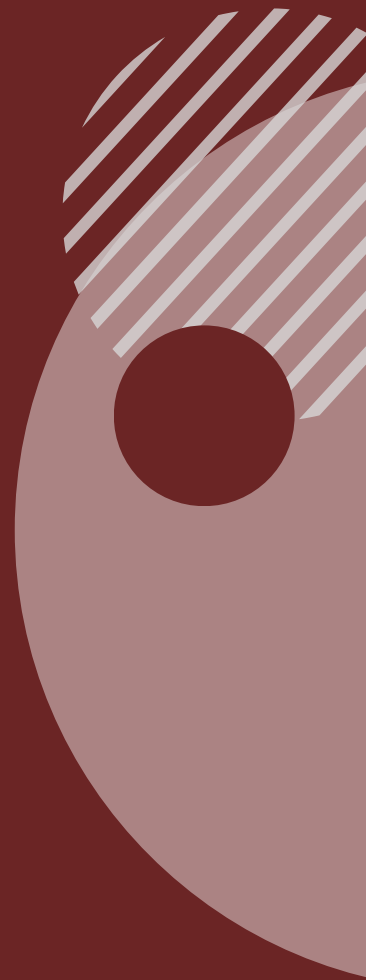
Another difficulty is the frequency of personnel changes in the Programme and its sensitivity to individual dedication.

Officers and staff involved in the Programme are seconded from their home forces. This has meant that diligent and high-impact PRAP personnel can be called back to their local force without secondment contracts being renewed. This leaves vulnerabilities and gaps in the Programme and creates a lack of security and stability for personnel. When an individual moves on, therefore, it can also mean that work simply draws to a halt.

The Race Action Programme must put in place clearer long-term structures to support the organisational memory of the Programme to become more robust. This ought to include proper functioning human resources and project management systems within the programme.

A commitment has been made by the new NPCC Chair, Chief Constable Gavin Stephens, to reconsider the structure and resourcing within the Programme.





04

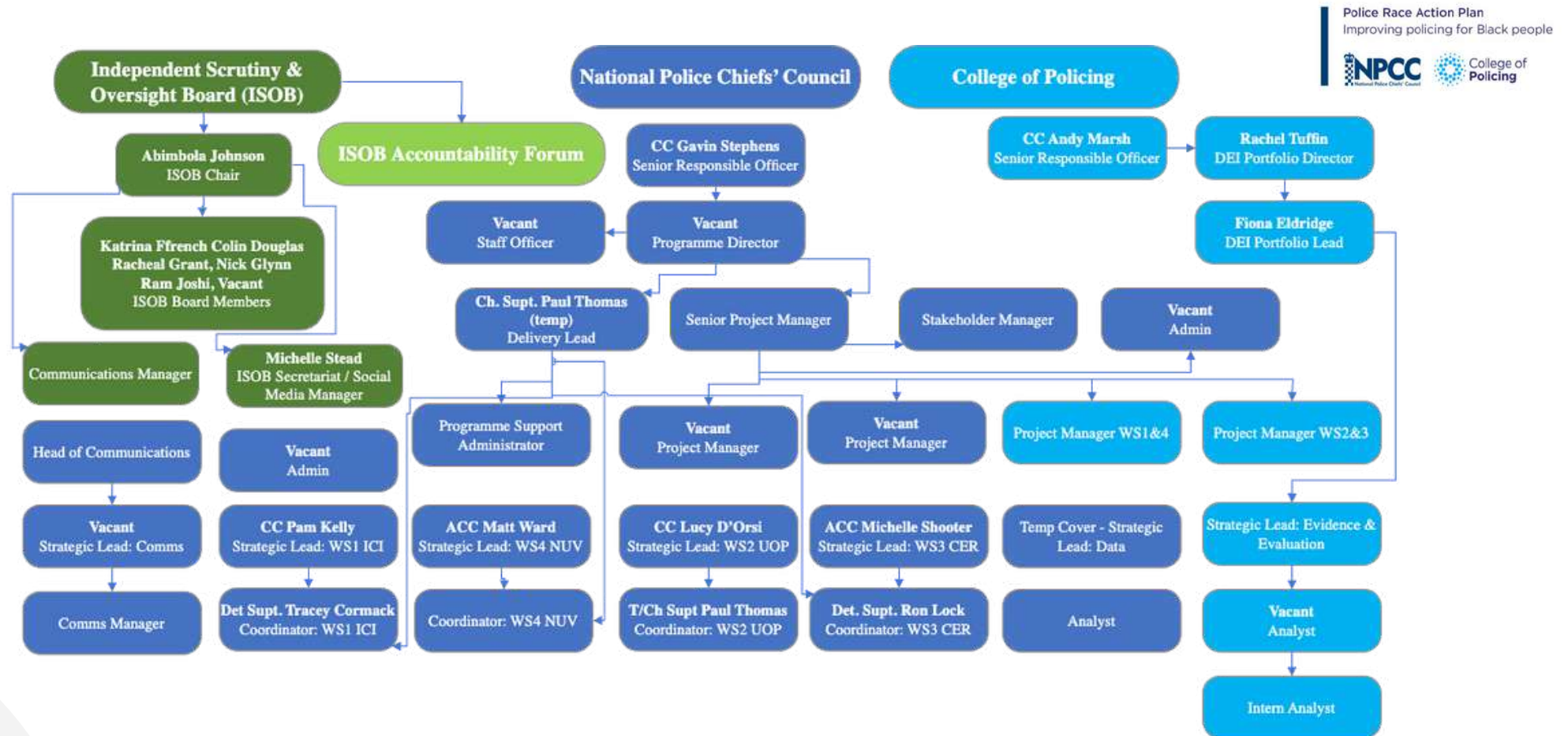
RACE ACTION PLAN STRUCTURE



“Dismantling racism requires transformative change. It requires curiosity, vision and a personal commitment to make your organisation as equitable and - let’s be honest - as great as possible. Transformative change is a one-to-many approach (impact will affect large volumes of people), rather than one-to-one (which affects just a few and/or is a one-off). The purpose of taking a transformative approach is to interrogate the foundations that make up your culture, to help you decide what needs adjusting, replacing or dismantling in order to level the playing field for Black colleagues.”

Shereen Daniels, The Anti-Racist Organization: Dismantling Systemic Racism in the Workplace (2022)

Police Race Action Plan Structure August 2023



The Race Action Plan’s ambition to create an anti-racist police service is significant. Never before has the national policing, on its own accord, made such a commitment. If this programme of work were able to deliver its promise, it would require a radical transformation of the institution of policing.

There are people in the Programme who have shown an outstanding level of dedication and commit every day to challenging the police to fulfil its aim. However, they are working within a structure that ultimately lacks strategic focus and risks failing in delivery. Issues within the Programme have been made public, including accusations that it has manifested racism and discrimination in its own operation.¹⁹

¹⁹ [Police initiative to tackle racism accused of being racist](#), BBC News, 31 May 2023, and [Police chief leading racism plan retires after bullying claims made against him](#), The Guardian, 15 May 2023, [Internet, last accessed July 2023]

How the Programme works

The Race Action Plan contains four workstreams each of which has a workstream lead who is of chief officer status; and a workstream coordinator:

- 1 **Internal Culture and Inclusivity**
- 2 **Use of Powers**
- 3 **Community Engagement**
- 4 **Protection from Victimisation**

There are also two enabling workstreams:

- Data & Evidence**
- Communication**

The Plan is jointly owned by the College of Policing and the National Chiefs' Council. The NPCC Chair also chairs the Plan. The structure contains a Programme Board who meets every two months to review activity and receive updates; and our Board whose function is to scrutinise activity. There was previously an internal stakeholder group for the Programme however this no longer exists and will instead be incorporated into a wider NPCC stakeholder group alongside an external one.

Membership of the Programme Board includes:

- *The Plan's central team;*
- *The ISOB*
- *The Police Federation*
- *The NBPA*
- *The Superintendents' Association*
- *The Association of Police and Crime Commissioners*
- *The Home Office*
- *The Ministry of Justice*
- *The IOPC*
- *HMICFRS*
- *The NPCC*
- *The College of Policing.*

Ice-Breaker Forces

The Race Action Programme defines an ice-breaker force as a police force that, by their leadership, have either already shown examples of good practice or are willing to pilot activity working alongside the Chief Constable leads who manage each workstream in the Plan.

Specifically, as an Ice-breaker they may be asked to:

- Carry out pragmatic testing and develop methods of working, solutions, methodology that generate best practice for activity and actions within the Police Race Action Plan that can be used across wider policing
- Promote good practice generated as a result of the ice-breaker activity
- Be an early adopter of new methodology and practice generated by the Police Race Action Plan

As of July 2023, the ice-breaker forces include:

Avon & Somerset
Bedfordshire
British Transport Police
City of London
Cumbria
Devon & Cornwall
Durham
Dyfed-Powys
Greater Manchester
Gwent
Hampshire
Humberside
Lincolnshire
Manchester
Merseyside
Metropolitan
North Wales
Northamptonshire
South Wales
Surrey
Sussex
Thames Valley
Warwickshire
West Midlands
West Yorkshire.

Task and Finish Groups

The Race Action Programme defines a task and finish group as follows:

A “Task and Finish Group” enables a workstream to be embedded and aligned with the Race Action Plan outcomes framework and support the implementation of the actions. They have a responsibility to ensure effective delivery and coordinated debate driving towards national-level adoption and force-level implementation of workstream actions.

The “Task and Finish Group” is co-chaired by the NPCC Workforce Committee Coordinator. It comprises representatives of groups that are responsible and accountable for the delivery of the actions within a Workstream. The Task and Finish Groups report to the workstream leads, who in turn report to the Police Race Action Programme Board chaired by the Senior Responsible Officer.

Each workstream can have a “Task and Finish Group”. However, not all workstreams require one due to varying deliverables. This is agreed between the Programme Director/Delivery Lead and workstream coordinator.

Outside of Programme Board meetings, ISOB members are available to have meetings with each of the workstream teams, observe Plan related activity and we convene monthly as a Board to update one another on our observations and recommendations to the Programme.

As is detailed in the workstream specific feedback later in this report, we do not yet see a strategic use of these boards or groups.

There are a number of local forces who are identified as “ice-breaker forces” or are members of “Task and Finish groups.” In reality, there is a lack of clarity as to how forces were selected to become part of the ice-breaker and task and finish groups and they are not used consistently across workstreams.

The definitions of both groups provided by the Programme Team do not marry with what we have seen in action, for example, some forces are categorised as an ice-breaker with little to no tangible activity around the Plan and very little internal communications around the Plan.

The Programme Board often crams a lot of detail into meetings leaving little time for proper digestion of information. The meetings do not provide space for and lack reflective input from the organisations that sit on the Board.

This leads us to question how useful a mechanism it is, in its current format, for developed insight to be fed into the Programme or into the organisations represented in Board membership. We do think however that it is positive that this range of statutory organisations are represented on the Board which only further emphasises the need to ensure meetings achieve their proposed purpose.

We note the lack of external input into the Programme Board, aside from the ISOB. Bringing external stakeholders into the Programme Board represents an opportunity for the Plan to ensure “that those who trust policing the least should have the most opportunity to influence how [the Police] work.”²⁰

A commitment made by the new NPCC Chair in his first week in his role. Opening up membership of this Board would be an opportunity for the Plan to demonstrate its trust in Black communities and anti-racism organisations.

²⁰ *New NPCC Chair sets out listening to communities as key priority as he steps into role*, NPCC, 3 April 2023 [Internet, last accessed July 2023]

Statutory Footing

The Programme is not overseen by central government. Instead, it is funded entirely by contributions from each of the 44 police forces in England and Wales. The advantage of this is that it provides policing with an opportunity to demonstrate a true commitment to anti-racism. Should this Programme deliver its aims, policing will be able to say that it became anti-racist simply because it is the right thing to do, without threat of penalty or punishment for failure. The other side of this lack of government oversight however is the absence of 'stick' in the Programme. It relies on the individual commitment of the 44 individual forces to implement the Programme.

There are of course statutory bodies whose remit it is to hold the police to account including:

- **Police and Crime Commissioners;**
- **The Independent Office for Police Conduct (IOPC);**
- **His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)**

Furthermore, as the College of Policing co-owns the Programme, they have the ability to implement national guidance in line with Programme aims.

HMICFRS has several inspection portfolios that cover areas of the Plan's work. For example, thematic Criminal Justice Joint Inspections which are looking at Race & Policing; Police Efficiency Effectiveness and Legitimacy (PEEL) Inspection – Revised inspection framework 23-24; National Team – Serious Youth Violence/Homicide Reduction; their investigation into super complaints covering suspicion-less stops (which they are conducting jointly with the IOPC and the College of Policing); and the treatment of victims of sexual abuse who are from minority communities. Since 2020, the IOPC has also run thematic inspections on race. It is of note that these organisations set their plans and priorities years in advance. Meaning that the Plan will need to work strategically with both bodies incorporating their rhythms of work if Plan actions are to be directly considered by either organisation.

Each statutory body is represented on the Plan's 'Programme Board.' However neither HMICFRS nor the IOPC have specific remit to inspect or investigate against the Race Action Plan nor do they do this for other national policing initiatives such as the Violence Against Women and Girls Strategy. The Association of Police and Crime Commissioners has publicly committed to the aims of the Plan.

However, as with the NPCC, this still relies on the prioritisation of the plan by each individual commissioner who are elected political officials with a number of competing areas of focus.²¹

The strategic approach of the Plan is therefore absolutely essential to its efficacy. The work of the Plan needs to be as transparent as possible with actions written and devised in a way that allow for inspection by statutory bodies, using clear metrics, timelines and cross over with established priorities of those groups to ensure the Plan falls within their jurisdiction. The Programme Board needs clarity of purpose, with members having decision-making power and influence within their organisations whilst also having the capacity to attend meetings feeling thoroughly prepared and able to provide key insight and feedback to the Programme.

The Structure of the Race Action Plan

From the outset, the Programme has adopted a structure that replicates those in policing. The shape is in a pyramid, with lower ranking officers dedicating the most time to the Programme without much decision-making power; those towards the top increase in police rank and balance their Programme responsibilities against other national pieces of work.

This means that those who do the majority of the heavy lifting in the Programme are not the ones who make decisions.

They also often have to compete to get time with the senior leaders in the Programme for review and sign-off of the conclusions of their work.

The Programme's rank-based structure means that it is harder for Black officers and staff to occupy more senior, decision-making roles in the Programme. As the Plan itself highlights, "once recruited, progression through the ranks for Black officers is markedly slow."²²

This means talent and key qualifications are overlooked by the Programme. For example, there are officers in the police who sit amongst the rank and file but bring decades of community engagement experience and strong community standing to their roles. Some officers hold academic degrees that examine and analyse racial discrimination and disparity in policing. These are undervalued by the Programme's criteria.

As local police forces have started to introduce structures that mirror the national Race Action Plan for their own local implementation, this is a pattern that risks being repeated across England and Wales.

²¹ [NPCC AND College of Policing's Race Action Plan](#), Association of Police & Crime Commissioners, 24 May 2022 [Internet, last accessed July 2023]

²² [Police Race Action Plan: Improving Policing for Black People](#), page 21, May 2022, NPCC and College of Policing, [Internet, last accessed July 2023]

Personnel

The Programme uses seconded officers and staff to resource the central team. The advantage of secondments is that a range of people can move in and out, bringing with them the perspectives of their forces and communities to the national team. This in turn strengthens local connections to the national vision when members return to their previous roles.

However, heavy secondment use also has significant disadvantages. As the Plan is financed year by year by the NPCC, secondments are offered for one or two-year stretches, creating job insecurity for secondees.

Although the 44 Chief Constables committed to the principles of the Race Action Plan in June 2020, some of those Chiefs have since been replaced, and with the passage of time, local priorities have changed. We have seen staff and officers involved in the Programme called back into force by their Chief Constable. Secondees have raised concerns that they return to the same positions they occupied before participation in the Programme. The Plan is not valued or seen as 'operational' and therefore not worthy of contributing to career progression. Local work is prioritised over their work in the national Programme. This calls into question the true value given to the work of the Programme by those police chiefs.

This movement also creates instability within the Programme. Individuals work hard to foster relationships. For anti-racism work to embed properly, particularly work that centres on improving trust and confidence, consistency is important. Recruitment and vetting in policing is extraordinarily cumbersome which means that replacing staff can take a disproportionately long time. Vacancies in the Programme create gaps that lead to work being deprioritised and, in turn, delivery declines.

Those who do the daily work in the Programme do not receive administrative support. This means that they are occupied with time-consuming daily tasks, such as diary and inbox management, leading to a lack of consistency in record-keeping across the Plan. A strong administrative team is required to also assist with managing team welfare. It would ensure that workloads are regularly reviewed with meetings and tasks properly spaced out and managed.

There are no change management, or human resource specialists in the Race Action Programme structure. A project management specialist was only recruited into the structure in early 2023. Equally, a proven track record of delivering anti-racism work was not formally part of any job descriptions for Race Action Plan roles.

Anti-racism training for central team members was only introduced in 2023, three years after the announcement of the Plan. The Race Action Programme is unique, it is not an 'operational' police programme but an anti-racism programme. There is nowhere in the current structure of the Plan for positions to be held by anti-racism specialists.

Without these skills being centred in the recruitment processes we have seen a lack of strategic approach being taken to a lot of the work of the Programme, which we expand on in the workstream chapters below.

The culmination of the above is that there are people in the Programme who are under immense pressure to deliver on their substantive work but are unable to do so without working unsociable hours due to not being given the space and resource to prioritise the right work. Once work is done, they then need to compete for time with decision-makers to obtain sign-off on work before it can move forward, or find themselves outside of decision-making conversations due to their positions in the Programme. This is against the background of knowing that in many cases, their work on the Programme can be viewed by their home forces as a 'backward step' in progression. Unsurprisingly, therefore, feelings of being undervalued have been reported in the programme.

Next Steps

The above issues have been raised with CC Gavin Stephens, the new Chair of the NPCC. Further administrative support has been promised however issues such as lengthy recruitment and vetting processes will be difficult to resolve. We have fed back on the need to prioritise restructuring the Programme and revamping processes within the next few months.

At the time of writing, there is an active recruitment process for an interim Programme Director and meetings have been scheduled to look at how the Programme should move forward to work more fairly and effectively.



05

RELATIONSHIP WITH THE NATIONAL BLACK POLICE ASSOCIATION

The National Black Police Association (NBPA) has around 5,000 members across the UK, with local associations in each police force or law enforcement agency. The NBPA seeks to improve the working environment of Black staff by protecting the rights of those employed within the Police Service, enhancing racial harmony and the quality of service to the Black community of the UK and assisting the Police Service in delivering a fair and equitable service to all sections of the community. As such, it plays a unique role in scrutinising the Plan to ensure that it works for Black communities both internally and externally.

Feedback on the Race Action Plan from NBPA President, Andy George

Development of the Race Action Plan and Programme

In March 2022, the Programme's previous Director and a member of the College of Policing sat down and independently wrote up the Race Action Plan. An incoming Programme Director, who was due to start in the subsequent months, was then expected to deliver on this Plan despite having not had any input on the content.

The President of the NBPA, Andy George, along with other members of the Programme Board pushed for a short delay to the launch of the Plan, which was allowed. The new Director invited Andy George to sit at a couple of two-day sessions with the NPCC and the College Race Action Plan teams to streamline the actions.

The NBPA has been referred to as 'co-developing' some actions, however, this has been conducted in an unstructured manner with a limited feedback loop. It would have one or two meetings with the Programme to provide its views and insights on a particular issue - e.g., the Black Curriculum - however, it would not be shown the updated product before publication.

Despite this, as an organisation, it had to push to be involved in the Race Action Programme. It was on the periphery, involved in discussions with leadership about the importance of its role which led to it being brought onto the Programme Board. Prior to that, it had received only sporadic phone calls from the original Programme Director.

Over time, the NBPA has become more involved in the recruitment processes for personnel in the Programme e.g. the ISOB Chair and Board, the Programme Director, and workstream coordinators.

The NBPA has highlighted consistently that its members must be involved in the fabric of the Plan due to their lived experience and intersectional backgrounds as Black people and police members. As a result, several NBPA members were brought into the Programme as workstream coordinators roles and equivalent.

However, early into the Race Action team forming, a number of issues developed. Members raised concerns about being described as 'too challenging' when they fed back on the Programme or tried to draw on their lived experiences. Promises of career development and training were unmet, and secondments were cut short. Roles on the Programme were re-evaluated and re-advertised without concerns raised about the process for doing so being addressed. Ultimately, several NBPA members left the Programme feeling underappreciated and dissatisfied with their experiences.

Current relationship

Over the course of the Programme, the NBPA has become more ostracised. Between October 2022 and January 2023 in particular, the NBPA states that its invitations to meetings have reduced and it has received fewer updates between Programme Board meetings. This has meant that its understanding of action implementation decreased and its insight into granular levels of activity also dropped. This is despite the NBPA being specifically referred to in the Plan as an organisation that would be used to implement various actions.

Despite being heavily mentioned throughout the Plan, the NBPA has not received additional administrative or financial resources to assist with the delivery of the Plan. This has meant that the majority of its national executive has had to assist with the Plan on top of their full-time roles. As a consequence of this, NBPA members are unable to reasonably prepare for meetings, sometimes missing them.

NBPA members who have been involved in the Plan report feeling under increasing levels of stress and pressure to deliver whilst managing feelings of guilt and frustration given their personal investment in seeing initiatives like the Race Action Programme succeed. This also means that as an organisation the NBPA struggles to create records of its involvement meaning that notes, organisational memory and reporting transparency are limited. This created a vulnerability for the organisation, a lack of records means the NBPA are not able to point to evidence of the parameters of their contributions. To do this, the NBPA needs administrative support.

The future

Moving forward, in the last few months, an NBPA Cabinet member has been assigned to each workstream which has increased their levels of involvement. The new NPCC Chair has shown a willingness to transform the culture of the Programme and has made concerted efforts to rectify the concerns that the NBPA have brought to his attention.

Every force we have visited has raised concerns about a lack of central direction from the national team such as guidance around frameworks and assistance with local level implementation. The NBPA would like to see a reset on how the Plan communicates at a local level, and a clearer delineation between the national guidance delivered by the central team and the local ownership for delivery by individual forces. Once that is established, expectations can be better managed around communication and responsibilities.

The structure and management of the Plan need to be considered. A more balanced approach to decision-making that better empowers those who do the day-to-day work of the Plan to have the final say over direction would streamline the Programme and reflect a more meritocratic approach to work.

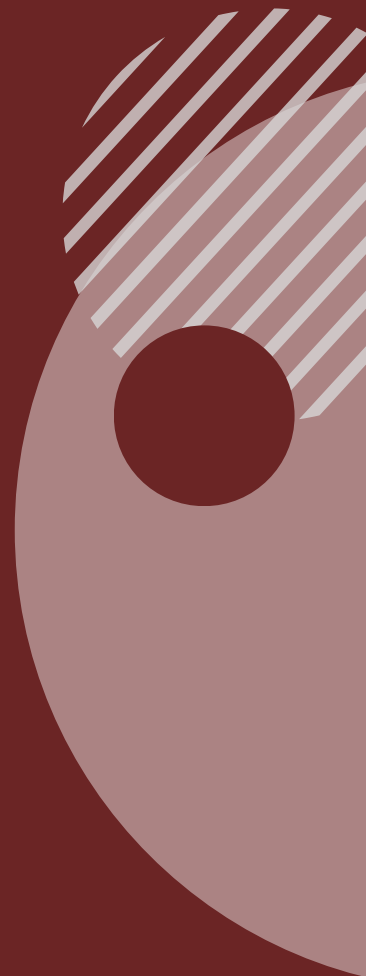
Reports such as Baroness Casey's have lifted the lid on the need to be bolder in action and ambition. The NBPA would like to see a proper mapping of the Casey Review against the Plan to see whether, in this new environment, it goes far enough.

The NBPA wants this plan to succeed and wants to be able to assist with this Plan, but to do that, it needs better support and resourcing. That must be provided over the course of the next year otherwise the Association's involvement will not be sustainable.

For reiteration to be successful, the Race Action Plan needs to be invested in as a priority programme for the NPCC and College of Policing. The vigour behind anti-racism work that was present in June 2020 when the Programme was announced has waned. The team needs to strategise on how it will recapture the principled basis for developing an anti-racism plan that ultimately concentrates on the experiences of a small sector of the national population but has a massive impact on the legitimacy of the police.

The NPCC and College of Policing need to take a decisive position about where they stand on institutional racism and to provide a robust evidence basis for the same. They then need to clearly set out how they will deliver a pragmatic and transformative programme against the backdrop of whichever stance is taken.

Andy George
NBPA President
July 2023



06

WORKSTREAM 1: INTERNAL CULTURE AND INCLUSIVITY

“You have to try and be invisible as a Black woman...If you complain you get a reputation as being trouble and then supervisors try and pass you on to other teams.”

Black female police officer,
Baroness Casey, Casey Review Final Report (2023)



A diverse police force that better reflects the citizens it has been tasked with serving is important. The first workstream of the Plan centres on Black representation in policing in recognition that Black people also wear the uniform and carry out police staff roles. The attraction, retention, and progression of Black police officers and staff is contingent on an inclusive internal culture. However, it is clear that this inclusive internal culture is lacking.

Home Office data shows that Black officers are more likely to leave the force early through voluntary resignation or dismissal than their white counterparts.²³ A report commissioned by the NPCC found that a disproportionately large number of internal conduct allegations against Black, Asian, and minority ethnic officers are being assessed by Police Standards Departments, with supervisors failing to deal with low-level matters at the earliest opportunity and proportionately.²⁴



Experiences of Black officers and staff

“Incidents of racial microaggressions, discrimination and harassment are common and prevalent within the last year within the police force. These are often not acted upon and reporting of incidents is low. Line manager response appears to be largely considered supportive however, when reports are made, outcomes are highly dissatisfying and often lead to the complainant feeling further ostracised. These experiences have a strong effect on feelings of worth and belonging, perceived opportunity to progress and increase the desire of respondents to leave policing.”

NPCC, Our Black Workforce Survey (2022)

“One of the things I find really strange is that, in all organisations – and I understand, the policing culture is different, if somebody says something that I find offensive or was inappropriate, I’ll have a conversation with them there and then and I feel supported in doing that. In the police, it seems like everything becomes – people hold onto things and then it becomes a huge issue (...) How isn’t it a culture where you make an offensive comment or something I find offensive and I’ll tell you about it there and then?”

Officer HRA FG2, NatCen Social Research, Enhancing Diversity in Policing (2018)

²³ *Police workforce, England and Wales: 31 March 2021 second edition*, GOV.UK, updated 30 March 2022 [Internet, last accessed July 2023]

²⁴ *NPCC: Understanding Disproportionality in Police Complaint & Misconduct Cases for BAME Police & Staff 2019*, Cain P., National Police Chiefs’ Council [Internet, last accessed July 2023]

Race Action Programme: Internal Culture and Inclusivity Workstream

The Internal Culture and Inclusivity workstream is one of the more developed workstreams which can be seen in the information and reports provided to ISOB by the Race Action Programme.

The activity in this workstream has benefitted from the ring-fenced funding for the Police Uplift Programme, which seeks to restore the 20,000 police officers lost through austerity measures. The programme has provided good insights into police disciplinary processes and has raised questions about disproportionality in the application of the conduct procedures for Black officers, and the supervision and pastoral care of Black officers in general.

There have been some positive achievements with the Police Uplift Programme, especially the marked improvement in addressing bias in recruitment campaigns, but there is still more to do. Recruitment of officers from Black backgrounds is still far below equivalent population figures. While the Race Action Plan highlights disparities in recruitment processes, and the goal to reduce those disparities, there is no routinely published data which tracks progress towards this goal.

As of 31 March 2022, Black officers accounted for 1.3% of the police workforce compared to 4% of the wider population.²⁵

That equates to fewer than 1,800 Black police officers (full-time equivalent) spread across all 43 forces in England and Wales. The proportion has barely increased at all over the past decade. In 2010, Black people made up 1.0% of the force.²⁶ The Programme has yet to outline how it will tackle this lack of representation. This should be a priority for this workstream. The Plan should commit to improved and transparent data collection in recruitment to ensure better monitoring and forces are incentivised, through clearer guidance, to create more equitable local processes.

To date, much of ISOB's scrutiny for the Internal Culture and Inclusivity workstream has focused on activity arising out of the Police Uplift Programme as it is an area of high activity. As we spend more time scrutinising other areas of the workstream, we will reach a view about whether time and resources are being focused on the right priorities.

Police Uplift Programme

In July 2019, the Government announced plans to recruit an additional 20,000 police officers in England and Wales by the end of March 2023.* The Home Office established the Police Uplift Programme to help forces to achieve this. In a first for policing, the Police Uplift Programme worked across the Home Office, the NPCC, and the College of Policing, with officers and staff seconded from all three organisations.

It was hoped that a 20,000 net increase in officers would ease the pressure on officers and help reduce crime and improve outcomes for victims, as well as lead to increased diversity in the police. The Programme succeeded in increasing the proportion of female recruits, as well as Asian and other minority ethnic recruits. However, the proportion of Black new recruits remained low, at just 1.6%.²⁷

**Critics have highlighted that prior to the establishment of the Police Uplift Programme, police numbers had severely dropped during this government's tenure citing reasons such as government cuts, and falls in PCSO and Special Constable numbers. They argue therefore that the Programme does not truly represent an uplift in numbers.²⁸*

²⁵ *Police workforce England & Wales: 31 March 2022*, GOV.UK, Published 27 July 2022. See Section 5 Diversity, Key Findings [Internet, last accessed May 2023]

²⁶ *Police Workforce Ethnicity Facts & Figures*. See section 4, 'By ethnicity over time, police officers', GOV.UK, 26 May 2023 [Internet, last accessed July 2023]

²⁷ *Police workforce England & Wales: 31 March 2022*, GOV.UK, Published 27 July 2022. See Section 5 Diversity, Key Findings [Internet, last accessed May 2023]

²⁸ *Police Uplift Programme: A Flawed Success Story*, Police Federation, 11 May 2023 [Internet, last accessed July 2023]

Areas of concern

Racial disparities in the Police Uplift Programme

As noted above, there are clear racial disparities in the recruitment of officers, even as the Police Uplift Programme sought to tackle representation issues.

We understand anecdotally that the Police Uplift Programme may have led to higher rejection rates for Black and minority ethnic applicants, compared to white applicants.

Unfortunately, we are unable to make a formal assessment of this as data from the recruitment process is limited. Forces track end-to-end recruitment for staff and officers through applicant tracking systems (ATS). Policing on the whole uses several systems and national data is not collected or made available as policing is unable to integrate the information.

Through the Police Uplift Programme, the police has standardised the processes and workflows within the ATS so forces have the ability to assess their own data locally and they can see any differences by protected characteristic (e.g., ethnicity, gender) or by stage in the recruitment process. Forces are able to monitor success and dropout rates.

In order to measure disproportionality - which is key to understanding whether disproportionality exists - candidates still in the process need to be taken out to assess 'completed' applicants, along with dropouts.

There needs to be more robust data collection and assessment in order to better understand any disproportionalities. This data should also be communicated to forces and to the public on a regular basis to ensure transparency.

Lack of clarity on desired outcomes

Often, we find that actions in the Plan are put forward without a clear articulation of the desired outcomes or results. This has been apparent in several moments. First, when the Programme recruited a Black Heritage Advisory Group.²⁹ it was not clear what that group's role would be, nor was the ISOB sighted on the recruitment process. Secondly, it took some time before the proposed curriculum for Black history and policing was shared with us. There needs to be clarity about how the curriculum will contribute to changing behaviour within policing. This clarity would then guide towards whom, within policing, the curriculum should be targeted and how it should be delivered.

Lack of visibility with key Black stakeholder groups

We are concerned about the lack of visibility of the Plan within other areas of policing. As a Board, the ISOB has had the benefit of receiving invitations to meet with Black staff associations and networks, and with other areas of work that cross over with the Plan e.g., Out of Court Disposals. In those meetings, it is often clear to us that these networks/stakeholders do not have the level of awareness of the PRAP that they would like. We believe that the Plan should increase efforts to enable those within policing with a direct interest in this area to keep themselves informed on progress with the Plan.

Localisation of the workstream

The Plan is lacking any scrutiny of how local forces will implement and use it to support localised efforts to change their culture and improve inclusion. We heard from forces that they have not received additional support and resources, resulting in them having to make decisions about what to abandon in order to implement the Plan.

They also reported wider implementation constraints, claiming that what seemed like simple actions are often split across several departments that do not align with each other. Equally, the implementation of one action in one force often resulted in a knock-on effect in another force. E.g., one force's human resources department may be hosted by another police force which raises funding, responsibility and coordination issues. More centralised, pragmatic support for local delivery is needed.

Reaching the right officers

Questions have been raised regarding what will be done to reach the supervisors who manage frontline officers and can therefore directly influence implementation of the plan. For the Plan to deliver, it needs to be felt in the interactions between officers, staff and community members. Serving officers have raised concerns about the lack of access to local and national structures and the need for more specific guidance as to how they can challenge and support meaningful implementation of the Plan.

²⁹ [Police Race Action Plan: Improving Policing for Black People](#), May 2022, NPCC and College of Policing, [Internet, last accessed July 2023]

Furthermore, the Plan needs to win the trust and confidence of Black and minority ethnic officers and staff who do not trust the institution enough or feel safe enough to raise concerns while serving. There are references to using the National and local Black Police Associations (“BPAs”) to assist with this. The majority of BPA members, themselves officers and staff of colour, conduct their work on a voluntary basis balancing it with their daily policing responsibilities. Capacity to provide reports and present their insight to the Programme is therefore limited. The Programme has not provided any further resources to BPAs to support them with Programme work and this risks imposing burdens for delivery onto people of colour in what is meant to be an anti-racism programme.

Reiteration of the Plan

Several reports detailing the experiences of officers have been released since the Plan was first iterated. Baroness Casey’s interim and full reports found that officers and staff suffered racism and hate from colleagues and were then let down by a weak response from the Metropolitan Police.³⁰ In February 2022, the IOPC published its report on Operation Hotton, which shone a light on racist attitudes and conduct in policing.³¹

The IOPC emphasised that this was not an isolated case and that similar instances have been uncovered in subsequent separate incidents in policing. HMICFRS also published its findings following an inspection of vetting, misconduct, and misogyny in the Police Service. It found that:

“police vetting standards are not high enough and it is too easy for the wrong people to both join and stay in the police.”³² The report also found that “some police officers have used their unique position to commit appalling crimes, especially against women.”

Given the findings, we would expect to see acknowledgement of the insights and their recommendations in the next iteration of the Plan, including a clear roadmap for how they will be implemented.

The ISOB received thoughtful recommendations for Plan structure and reiteration during our Accountability Forum sessions which we have encouraged the Programme to consider and incorporate into the Plan:

A

A set of detailed and nationally consistent commitments from the Police about what Black officers can expect from the force. Comprehensive commitments, rather than broad promises, to respect and create an inclusive culture.

B

The Plan should be an accessible route for Black officers and Black staff to directly provide feedback and raise concerns about local implementation. Implementation will vary across forces, but accessibility to the Programme should not be a postcode lottery. Black officers and staff have a unique position of feeling the direct impact of these issues both personally and professionally.

C

A need to see metropolitan forces adopt the Plan with enthusiasm to genuinely transform policing. For example, the Metropolitan Police Service whose membership consists of almost 1 in 4 officers across England and Wales.

D

Formalised structures to ensure that officers and staff, particularly those of colour, who shoulder responsibility for plan delivery and development are properly supported and resourced in their work.

³⁰ *Analytical Report - evidence to support Baroness Casey of Blackstock's conclusions about the current misconduct system in the Metropolitan Police Service*, Baroness Casey of Blackstock DBE CB, October 2022 [Internet, last accessed July 2023]

Baroness Casey Review Final Report: An independent review into the standards of behaviour and internal culture of the Metropolitan Police Service, Baroness Casey of Blackstock DBE CB, March 2023 [Internet, last accessed July 2023]

³¹ *Operation Hotton Learning Report*, IOPC, September 2021 [Internet, last accessed July 2023]

³² *An inspection of vetting, misconduct, and misogyny in the police service*, HMICFRS, 2 November 2022, [Internet, last accessed July 2023]

Feedback from the National Black Police Association (NBPA)

The Black Heritage Advisory Group (“BHAG”) membership currently consists entirely of retired and serving officers and staff. This covers the same jurisdiction as the NBPA. When it was initially proposed this was to be a group containing a mixture of academics, community members, and retired and serving officers and staff. Clarity is needed on how or when external recruitment will progress and how the College is seeking to ensure that the views in the group are representative of the complex backgrounds and experiences of Black communities. It’s also not clear when and how the College will interact with the BHAG, NBPA, staff networks, and stakeholder groups.

The qualitative work around the Black workforce survey consisted of hosting focus groups and interviews with local officers selected at random. This did not specifically target NBPA members. As an Association, the NBPA is not used strategically to gain insight.

There is an action within this workstream to ensure that Black officers and staff have access to appropriate support, including to their BPAs and Race Equality Networks. To provide appropriate support in every force, the NBPA would need to see a drive for provision of extra resource, this has not been forthcoming.

We provided a nine point plan to Operation Hampshire - a nationwide strategy dealing with assaults on police officers. However, this has not been incorporated into the work of the Plan and we have not been consulted on the reasons for this.

Generally, more needs to be incorporated around grievances, as well as training on how to spot racial discrimination, with more done to hold leaders to account. This is where a dashboard would be useful in picking up data up around these issues.

Next steps for the Internal Culture and Inclusivity Workstream

As outlined above, the workstream meetings have, so far, focused on the recruitment of Black officers and also analysis of disproportionality in the conduct procedures for Black officers. We will now be focusing greater attention on scrutinising progress against other areas of this workstream, and looking at the evidence for the impact these areas could deliver to improving internal police culture on issues of race.





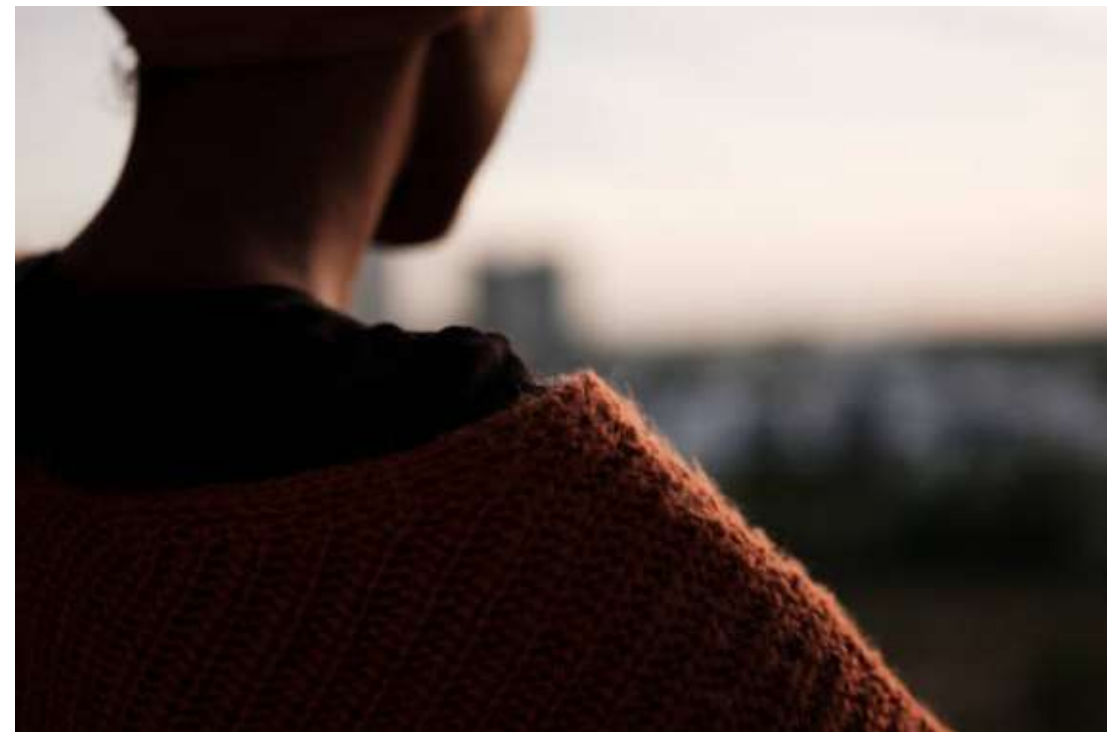
07

WORKSTREAM 2: USE OF POWERS



*"...the incident that happened (was) treated not as a safeguarding issue. (It was) treated as a criminal matter."
 "(Professionals) treated her as an adult. (She was) searched as an adult." "Child Q is a changed person. She is not eating, every time I find her, she is in the bath, full of water and sleeping in the bath. Not communicating with us as (she) used to, doesn't want to leave her room, panic attacks at school, doesn't want to be on the road, screams when sees/hears the police, and we need to reassure her."*

Child Q's mother, para 4.3, pg 12, Local Child Safeguarding Practice Review: Child Q (2022)



"The police use of stop and search powers have become a totemic issue in recent years. However, our research suggests that Black people's concerns about the use of stop and search can't be viewed in isolation. Instead, their views about how the police do stop and search are closely connected to their experience of local policing overall."

"In our focus groups and polling, Black people expressed as much concern about a perceived failure by the police to get the basics right, such as taking crimes seriously and supporting victims, as they did about stop and search. This sense is evident across all ethnicities but is particularly prominent in Black Caribbean communities,"

Harvey Redgrave, Chief Executive Officer at Crest Advisory, (November 2022)

The police may sometimes have to use specific powers in the fulfilment of their duties. This can include the use of force, search, and seizure. However, official statistics for England and Wales, which are published by the Home Office and based on police-recorded data, regularly show that the police often use their powers on Black people disproportionately compared to white people.³³

In the twelve months to April 2022, the Police stopped and searched Black people at a rate 7 times higher than white people, the use of force rate was 3.5 times higher for people they perceived to be Black.³⁴ The police discharged or drew Tasers on Black people at a rate that was 4.1 times higher.³⁵

Significantly, those perceived as male, aged 18-34 and from a Black ethnic groups accounted for 7% of all 'use of force' incidents, compared with 0.5% of the overall population, and a rate of 145 'use of force' incidents per 1,000 population.³⁶

Other data sources present a similar picture. The Crime Survey of England and Wales, which does not rely on police recording, shows that Black people are significantly more likely than white people to experience police contact that has been initiated by officers, even after controlling for other explanatory factors.³⁷

The data only captures one part of the picture, however, and there is a wider impact to the disproportionate use of force by the police on Black communities. Crest Advisory noted in its recent report on Stop and Search that:

"The longer a Black adult's family had been settled in the UK, the more likely they were to have found the experience of being stopped and searched traumatising; 43% of first-generation Black adults found the experience of being stopped and searched traumatic compared to 61% of second-generation Black adults generally also held more negative views of the police. Out of our boosted sample of all adults (n=5455), 28% of second-generation Black adults and 31% of third-generation Black adults stated that they would express negative views when discussing the police with family and friends, compared to 20% of first-generation Black adults."³⁸

Areas of concern

Missing pieces

The Plan's priority areas (below) for the Use of Powers workstream have created missed opportunities for actionable and tangible change.

- A. *Adopting an agreed national approach for the recording, analysis, supervision and scrutiny of police powers - section 163 of the Road Traffic Act (RTA) (power of police to stop vehicles), section 60 of the Criminal Justice and Public Order Act (CJPOA) (allowing any uniformed constable to stop and search any pedestrian or vehicle driver and any passenger), use of Taser, use of force - to identify and take actions to eliminate racial disparities at force and individual levels;*
- B. *Identifying and addressing disproportionality in the use of Taser and use of force, by having robust accountability and learning processes based on scrutiny and supervision; and*
- C. *Developing a framework to implement the recording of vehicle stops under section 163 of the RTA.*
- D. *Broadening the scope of the Use of Powers workstream to include:*
 - *arrest,*
 - *all forms of strip search (including 'more thorough searches) and*
 - *new and emerging powers provided by the PCSC Act 2022, such as those*
 - *related to public order (Part 3) and Management of Offenders (Part 10).³⁹*

Information received on non-priority actions has been limited and at a very high level. When we have received information about those areas, it's clear that work is at very early 'scoping' stages.

The areas for priority do not focus on reducing the disproportionality present in stop and search despite there being a commitment included in the May 2022 Plan.⁴⁰ This is a power that is consistently highlighted as an area of concern in the way that the police interact with communities, Black people in particular. The impact of this has been that other more intimate searches are also not captured in the work being conducted by the Plan.

The lack of activity in this area by the Programme is a significant deficiency that must be addressed as a priority. The team has accepted this and we understand efforts are being made to engage with the NPCC's national lead on stop and search. However, at this stage in the Plan, foundational work ought to have been well established, with evidence of progress and results communicated to the Programme and the public.

The work on suspicionless searches (Section 60) appears to have been put on hold while HMICFRS deals with a super-complaint by the Criminal Justice Alliance.⁴¹

³³Stop & Search by Ethnicity, GOV.UK, 27 May 2022, [Internet, Last accessed May 2023]

³⁴Police use of force statistics, England and Wales: April 2021 to March 2022, GOV.UK, 15 December 2022, [Internet, last accessed May 2023]

³⁵Police use of force statistics, England and Wales: April 2021 to March 2022, see section 6.4 'Rate of CED use higher for people perceived as from black ethnic group', GOV.UK, 15 December 2022, [Internet, last accessed May 2023]

³⁶Ibid, see section 4.5 Black males aged 18 to 34 experienced the highest rate of 'use of force'

³⁷Bradford B. (2017). 'Stop and search and police legitimacy'. London: Routledge.

³⁸Crime, Policing & Stop and Search, Black perspectives in context, Crest Advisory, Evans A, Olajide P, Clements J, November 2022, [Internet, last Accessed May 2023]

³⁹Police Crime Sentencing & Courts Act 2022, GOV.UK, 2022 [Internet, last accessed July 2023]

⁴⁰Police Race Action Plan: Improving Policing for Black people, NPCC and College of Policing, May 2022, See page 32 for the third action under this workstream [Internet, last accessed July 2023]

⁴¹More Harm than Good, Criminal Justice Alliance, 24 May 2021 [Internet, last accessed July 2023]

The Use of Powers workstream does not appear to reflect an approach that recognises intersectionality. There are specific groups within Black communities who have distinct experiences as a result of their unique identities. As set out above, young Black men are the most disproportionately affected by the use of force. Similarly, members of the same family can experience different levels of generational trauma, and the trauma of a strip search may impact a young female differently from a young male. In addition, studies show that people with multiple disadvantages such as mental health difficulties, homelessness, and addiction issues are affected in different ways by the use of force. Solutions and engagement therefore need to be sensitive to these nuanced experiences.

We note that there is pressure in policing to adopt various new technologies, such as facial recognition, body cameras and other biometric capturing equipment which are referred to in the plan but have not been focussed on or addressed by this workstream over the past year.⁴² This ought to be a priority for the Plan. There are many key civil liberties and human rights groups who have raised concerns about the risk of discrimination in the use and development of those technologies.⁴³ Most would therefore expect an anti-racism police programme to engage with those areas too.

The workstream's focus on data gathering risks losing sight of the need to simultaneously push and assist local forces in implementing change that will tangibly reduce the disproportionality experienced by Black communities.

Further, there are key uses of powers that are neither being addressed by this workstream nor do they appear in the current version of the report. For example the treatment of suspects in custody which has consistently been highlighted as a key area of concern for Black communities.⁴⁴

Siloed working

There are clear areas of crossover between this workstream and others. However, as with other areas of the Programme, this workstream has not mastered working with other teams.

For example, vulnerable groups are the most likely to receive the worst outcomes in police interactions but we have seen little evidence of cross-working with the protection from victimisation workstream or with national leads in policing who concentrate on areas such as mental health.

Community engagement is a key accountability check on use of police powers but again we see little evidence of these workstreams working together. This workstream's own use of community engagement mechanisms is in its infancy. For example, outreach has only just begun to source forums of young and vulnerable people and other community groups.

Action Feedback: Adopting an agreed national approach for recording, analysis, supervision and scrutiny of police powers

As set out in our review of the Plan's Performance and Data, and Evidence and Evaluation workstreams, we have received regular updates on the National Police Data Transparency Survey, which includes data on the use of powers. However, a theme with data and evidence updates is the need to demonstrate an evaluation strategy and accompanying metrics to measure success. The next iteration of the Plan needs to clearly set these out. We have been assured that ownership of projects and specifics around the role of the NPCC and other agencies will be better detailed.

We have been told that work has progressed around the annual data requirement ("ADR") system to cover other uses of power including stop and search and lesser-discussed powers like dog bites. The advantage of this is that the data obtained will be open-source material and hosted by the Home Office thereby increasing transparency and accessibility of information to the public. The data is proposed to be detailed enough to enable the mapping of multiple types of use of force. However, the workstream has observed that despite it being a requirement, some forces still do not return their current ADRs. Home Office oversight in this area is necessary for uniform and consistent data collection.

We recognise the need to ensure there is a good evidence-based foundation for work in the Plan. However, data collection should not delay action.

⁴² *Ministers looking at body-worn facial recognition technology for police*, The Guardian, 16 May 2023 [Internet, last accessed July 2023]

⁴³ *Human rights coalition calls for immediate ban on facial recognition*, Liberty Human Rights, 23 August 2021, [Internet, last accessed May 2023]

⁴⁴ See as examples: *Dame Elish Angiolini's Report of the Independent Review of Deaths and Serious incidents in Police Custody*, Chapter 5, Ethnicity, Rt.

Hon. Dame Elish Angiolini DBE QC, January 2017 [Internet, last accessed July 2023],

and *"I can't breathe: Race, death & British policing"*, Inquest, 2023 [Internet, last accessed July 2023]

Annual data requirement

The Home Office collects, processes and analyses national crime and policing data provided by the 43 territorial police forces of England and Wales and the British Transport Police.

These collections form part of the Home Office Annual Data Requirement (ADR). The ADR is a list of all requests for data made to all police forces in England and Wales under the Home Secretary's statutory powers. A wide range of data are collected, including crime, police workforce, arrests and stop and search. The full list of data collected under ADR is published at Annual Data Requirement from police forces in England and Wales.

The data is provided to the Home Office for research and statistical purposes. Additionally, homicide and firearms offences data are used operationally by the police forces and other law enforcement agencies upon request.⁴⁵



Action Feedback: Addressing disproportionality in the use of Taser and force through robust accountability and learning processes based on scrutiny and supervision

In March 2023, the ISOB attended an online event for the "TASERD" research project, led by Keele University and University College London, which is investigating Taser use and its association with social,⁴⁶ ethnic, and racial disparities in policing. The group's early currently unpublished findings were presented to attendees. While the group's work demonstrated a great model of joined-up working across community groups, charities, academia, and the police, what is clear is that the project will not be making specific recommendations for action but rather act as a standalone research project. We question therefore what activity TASERD will drive in the Plan. This has not been specified by the workstream team.

There is significant support within policing for the wider rollout of Tasers, with individual chiefs and the Police Federation backing this approach.⁴⁷ We are concerned that any findings related to race disparity will be overshadowed by this unbridled enthusiasm.

We haven't seen any other examples of work completed about Taser in this programme. It doesn't appear to be work that's been brought into the fold of the Plan's structure.

⁴⁵ [Home Office Annual Data Requirement \(ADR\) data](#), See "Background" section, GOV.UK, 18 November 2022, [Internet, last accessed July 2023]

⁴⁶ [Taser Use and its social, ethnic and racial disparities in policing \(TASERD\)](#), Keele University, March 2023 [Internet, last accessed July 2023]

⁴⁷ [Taser - what is it and how do we use it?](#), Northamptonshire Police [Internet, last accessed July 2023]

Action Feedback: Road Traffic Stops

We have received the most substantial updates from the Use of Powers workstream about traffic stops but have had limited insight into force-level implementation. There are no “ice-breaker” forces or “Task & Finish groups” for the Use of Powers workstream or this piece of work.

The Use of Powers workstream team has been unequivocal in stating that there is “no excuse for not recording traffic stops,” in light of the long-term recommendations from the Stephen Lawrence Inquiry Report and the Police Inspectorate.

This work goes beyond the legal requirement to demonstrate not just lawfulness but legitimacy. Through this workstream, there is an opportunity for the Police to demonstrate an understanding of the concerns of Black communities and to go the extra mile in showing thoughtful and anti-racist implementation in the use of a power that has caused many in Black communities to have negative experiences with the Police.

The Use of Powers workstream team has been open to providing the ISOB progress updates on its Road Traffic Stops work with the N8, the eight most research-intensive universities in the North of England.⁴⁸ The N8 is providing academic review to their work which reflects a level of stringent and specialist scrutiny.

An ISOB member was present at N8’s conference in Penrith in June 2023.⁴⁹ Whilst much promising related academic work was shared at the conference, the ISOB has not yet received detailed information about how this will be actioned more widely than the originating police force.

We have seen emerging programmes for the collection of traffic stop data, including the recording of driver ethnicity, as well as considerations on whether the ethnicity of the passenger should also be recorded. We have recommended that data protection, legal, and ethics experts in this area should be consulted to properly examine the consequences of collecting data on vehicle passengers. We highlighted in particular the risk of this turning into a mechanism for collecting police intelligence e.g., what if the same individual is repeatedly a passenger in a car with someone suspected of drug dealing? Would this create a risk that is used as an avenue to record the passenger on something akin to the gangs violence matrix as a “known associate”?

We would like to see wider community engagement in this work. The ISOB heard recordings of a meeting between the Plan team and two men of Black heritage who’d had negative experiences of being stopped whilst driving. Although this reflects an attempt by the Race Action Plan to incorporate the views of those with lived experience, we would expect to see this as part of a considered and consistent engagement strategy. We understand that a PRAP Youth Forum is being developed in conjunction with external organisations.

Next steps for the Use of Powers Workstream

In the next iteration of the Plan, we expect to see clear measurable steps to achieving agreement on how race disproportionality will be measured; and an outline of the consequences of what should happen when racial disproportionality is identified.

As highlighted throughout this report, we have significant concerns around the lack of focus on key powers. This workstream needs to move forward from scoping exercises and initial conversations towards tangible change. It needs to broaden its scope of police powers beyond stop and search, traffic stops and use of force.

There are a significant number of key organisations and individuals with specialist knowledge in these areas who ought to be engaged with in meaningful ways by this team. We expect to see concerted effort and developments in these areas over the course of this year.



⁴⁸ <https://www.n8research.org.uk/>, N8 Policing Innovation Forum Conference June 2023 Website, [Internet, last accessed July 2023]

⁴⁹ *Improving Policing for Black People: The Race Action Plan*, N8 Police Research Partnership, Policing Innovation Forum 2023, [Internet, last accessed July 2023]



08



WORKSTREAM 3: COMMUNITY ENGAGEMENT



“Police forces should prioritise authentic, long-term engagement in local areas so officers understand the communities they serve, staying in their post for as long as possible to minimise staff turnover and churn. Officers should be given incentives to carry out neighbourhood roles: monitored performance appraisal processes should explicitly recognise an officer’s understanding of their local community.”

Crest Advisory, Stop and search: a plan for change (2022)

The relationship between policing and Black communities has been damaged by evidence of racism, as well as failures in protection and support experienced by many Black people over the years. The ongoing treadmill of reports and frequent incidents show the reality that racism still exists in policing.

The police's refusal to acknowledge institutional racism and its tendency to inflict backlash against individuals that do continues to cast a shadow on its relationship with Black communities. The evidence of racism, disproportionate use of powers, and under-protection of Black people as victims of crimes have damaged the relationship. Policing as an institution risks dehumanising Black people, treating them with lower levels of respect and dignity than their white counterparts.

The impact has been enormous. Confidence in the police is at the lowest it has ever been across Black communities. Research by the UK Parliament's Joint Committee on Human Rights shows that:

85% of Black people in the UK are not confident that they would be treated the same as a white person by the police.⁵⁰

The Plan should have been the opportunity to undertake genuine community engagement to start building trust between the Police and Black communities.

Yet, only 10% of the responses to the public survey on the Plan were from Black and Black mixed-heritage individuals.⁵¹

While this is not entirely surprising - the Plan has been developed for a group that has the highest levels of mistrust in the Police - the survey is a signal that more must be done to engage Black communities.

A Guidance report on Independent Advisory Groups ("IAGs") has been completed by the College of Policing. It has collated information that forces can access with ease. Issues highlighted in the research include representation of Black communities within IAGs; clarity of purpose; level of support and sustainability of engagement; different approaches adopted across the country on vetting of IAG and Scrutiny Panel members; and differences in approaches to paying for attendance and/or travel.

There have been detailed discussions on engagement and scrutiny, with some good ideas for how to make improvements. We have raised concerns that the challenges will be in: (a) rolling out lessons learned to maintain some level of national consistency; and (b) focusing on initiatives that can be scaled up to have real impact.

Some forces are more advanced in their planning and action in this area than others.

Work so far has highlighted the importance of having a coherent approach to evaluation of community engagement. The College of Policing has been tasked with this, the evaluation strategy with the data and evidence workstream and the ISOB. We have encouraged the Plan to publish this strategy which will make it easier for local forces to implement action in their areas and for members of the public to scrutinise action.

Areas of concern

Focus of activity

Several aspects of the Community Engagement workstream have yet to be progressed. Many of these are the public-facing actions and sub-actions designed to keep different stakeholders engaged in, informed about, and updated on the Plan. This includes commitments to publish information, engage with external stakeholders, assess the role of policing in schools and community support activities, and engage with seldom-heard voices from Black communities. This trend confirms our overarching concern about this workstream which is that it is inward-looking and does not work toward systemic change.

Community engagement, and in turn this workstream, is key to the success of transforming policing, namely to demonstrate an ability to listen to and act upon the knowledge and experience of Black communities and their trusted organisations. There needs to be a concerted effort and focus on fostering meaningful relationships with external stakeholders.

10% Survey Response Rate

The Race Action Programme held a public survey for the Plan between May and August 2022. More than 5,000 responses were received of which 10% were from Black and Black mixed-heritage respondents. Whilst the low response rate from Black communities to the Plan is an indicator of the barrier that policing needs to tackle, it also points to wider issues of engagement fatigue.

It was clear from our Accountability Forum meetings that community members are fatigued by current methods of police engagement which are often approached as information-mining exercises by the police, rather than opportunities to truly engage. They do not feel valued and are not seeing any positive change so are reluctant to give more of their time and energy to programmes like this. The survey itself may have fuelled this sentiment. Respondents were restricted to commenting on the specific commitments in the Plan published in May 2022, rather than it being a meaningful consultation regarding what Black communities want from the Police.

There is a need to publicly demonstrate meaningful engagement with organisations and individuals. The Plan must demonstrate that it is not just asking people to share experiences, which are often traumatic, and ideas, but that it is also enacting and implementing change as a consequence.

⁵⁰ [Human rights of Black people not equally protected, say Committee](#), UK Parliament, 11 November 2020 [Internet, last accessed July 2023]

⁵¹ [We are listening to improve policing for Black people](#), NPCC, 10 Feb 2023 [Internet, last accessed July 2023]

Siloed working

A siloed working approach will impede the implementation and sustainability of the Plan. There are clear areas of this workstream that should be connected to the others and we have not seen evidence of cross-over between them. Some examples include:

the Internal Culture and Inclusivity workstream is not visible in the mentoring project being developed by the Protection workstream

the missing persons work in the Protection workstream is a key area of cross-over with community engagement

community scrutiny and IAGs are a significant part of acting as a check and balance on the use of powers but we have not yet seen evidence of joined-up working between the Use of Powers and Community Engagement workstreams.

The Community Engagement workstream also lacks public visibility even within Race Action Programme communications. For example, the progress made in this workstream was not included in a release from the NPCC and College of Policing on 10 February 2023 regarding survey feedback.⁵²

Methods of engagement

Meaningful engagement that empowers those that are participating and allows them to shape and influence requires high-quality information that is readily and easily accessible. Accessibility in this instance goes beyond just ensuring that people can access the information, but that it is presented in a way that is engaging and easy to consume. The Plan was not presented in an easy-to-read version in turn making it challenging to different audiences e.g., younger audiences, particularly the under-25s who have the most interaction with the Police, and those with accessibility needs.

We have suggested that the different mechanisms of community engagement be presented in user-friendly ways such as with the use of infographics for public-facing communication. We have also recommended that the Plan obtains qualitative feedback from Black/Black mixed heritage individuals. We also urge the Race Action Programme to communicate to audiences how it will be approaching engagement with Black communities.

Looking within

The overall aim of this workstream should be to centre communities and not always rely on police-centred initiatives. However, we have found that most of the work thus far has centred on reviewing current structures and identifying best practice.

Therefore, engagement with communities and organisations external to existing policing structures has been deprioritised. We have highlighted that focusing on identifying existing work that is going well without assessing the impact on communities is likely to lead to good work that policing has not previously come across or considered being missed.

For example, external agencies should be used and space should be made to consider how police initiated interactions with young people can be decreased. The use of police and education officers to engage with children and young people is an area of concern within Black communities, particularly after the case of Child Q. Several key external organisations possess the expertise and insight that can make this work effective.

As promised in the Plan, action needs to be taken to engage with non-police groups. Hopefully, with more external input this workstream can become more dynamic. As well as existing best practice being shared and implemented, new approaches need to be incorporated into community engagement.

Lack of metrics

Whilst there is a lot of activity, it is concerning that no clear metrics have been established for the assessment or evaluation of community engagement.

The tendency is to review existing engagement work in policing but without an evaluation of the mechanisms, it is unclear how to know what is effective.

The approach being adopted is to gather everything that is 'best' practice and we are concerned that the best is not the best but just practice. It would be advantageous when setting the metrics, for the connections between this workstream and the others to be strengthened and to address siloed working.

This has had an impact on the work that has been presented for scrutiny. Amongst the community engagement case studies being assessed, there is a mixed bag of projects from across the country. Many are no more than a rebranding of standard IAG work, and for some projects, it is difficult to identify impact.

Resourcing

Effective and impactful community engagement requires appropriate resourcing. There needs to be a clear commitment to staff time being allocated to implement the community engagement activities in the Plan, as well as budget and time commitments for each force to conduct engagement.

Equally, engagement should not be extractive or for free. Consideration should be given to remuneration and expense arrangements, alongside the efficacy of the mechanism.

⁵² *We are listening to improve policing for Black people*, NPCC, 10 Feb 2023 [Internet, last accessed July 2023]

Reiteration of the Plan

There has been very little, if any, discussion about the reiteration of the Plan. The APCC and NBPA are tasked with several specific actions within this workstream. Space for them to provide written progress reports must be provided to ensure that as much first-hand information is being shared and unfiltered views recorded. They should be sharing updates and reviews at the Programme Board level to increase visibility.

The launch of the next iteration of the Plan and any significant developments needs to be supported by a strong communications strategy and complemented with community events.

Next steps for the Community Engagement Workstream

A new community engagement structure is being established by the NPCC to create national internal and external stakeholder reference groups to create a national consistency in engagement. This is in its very early stages and will be work that the ISOB will be interested to see interacting with the Plan.

A two day community engagement workshop was held by the Programme team in April 2023. This included presentations from communities, police accountability organisations and the Programme team as well as in depth sessions focussing on local and national concerns around the Plan and engagement. A summary report of this event has been written up by the Programme team for wider circulation and we have encouraged the Programme to publish it in the interest of transparency and accountability.

We have been assured that qualitative engagement with communities will be prioritised and remain ongoing throughout the duration of the Programme with a view to creating structures that will remain after the expiry of the Race Action Programme. We will continue to monitor and report on this work.





09

WORKSTREAM 4: NOT UNDER-PROTECTED AGAINST VICTIMISATION

“A lower proportion of missing incidents related to Black children were resolved by the person being found by the police than incidents related to white and Asian children: only 16% of cases compared to 19% of incidents related to Asian children and 23% of incidents related to white children.”

Missing People, The Ethnicity of Missing People (2023)



Not enough is being done by the police to protect Black communities, who are far more likely to fall victim to violence and be murdered. Black people in England and Wales are four times as likely to be murdered as white people.⁵³ Missing children from Black communities are less likely to be recorded as being at risk due to their mental health or being at risk of exploitation than White missing children suggesting that risks may be being under-identified for children from Black communities.⁵⁴

Despite being more likely to be victims of crime, the support that Black communities receive from the police as victims is poor. There is a lack of confidence in Black communities in the police's ability to deal effectively with crime or take crimes against Black people seriously. For Black people who have interacted with the police as victims, they are left dissatisfied with the service that they receive. There have been several high-profile instances across the decades that highlight failings in the police to support Black people as victims and compound the lack of confidence in the police. Damilola Taylor, Stephen Lawrence, Nicole Smallman, and Bibaa Henry were all failed by the police and the structures that allow these failings to continue.

“While the Met are very active in areas of London with higher Black and minority ethnic communities, this does not mean that those communities are better protected from crime, and victimisation is in fact higher for certain crimes.”

**Baroness Casey (2023),
Casey Review Final Report**

Areas of concern

Analysing disproportionate crime types

We have seen limited detail on how the Plan will effectively analyse disproportionate crime types, and how it will be measured. In the first instance, we recommend that the Plan identifies the crimes that disproportionately affect Black people and where this workstream can have a direct impact. From here, we expect to see research and actions focused on improvements in victim or witness engagement, satisfaction rates after dealing with victim support officers, and satisfaction rates of victims of hate crimes.

We believe that taking a targeted approach will support moving the needle on the overall objective of this action.

Public safety response to hate crime and criminal exploitation

The scoping and identification of key areas in the public safety response action of the Plan were left to the National Black Police Association, local police forces and their community reference groups.

It is not clear what approach they were asked to take; we have not been provided with information about methodologies or the questions asked of these groups. Further, there are national organisations with high levels of expertise whose voices appear to be missing from consultation in this area.

We are concerned that the three areas identified: trafficking, drugs and gangs risk playing into racial stereotypes. The use of gang terminology in the criminal justice system and the approach to drug supply within it is extremely racialised. Understanding how these came to be identified as key areas is necessary for our ability to scrutinise the Plan. We would have thought that areas such as domestic abuse and the use of joint enterprise ought to be considered too.

We are concerned that there is a missed opportunity for this workstream to demonstrate a wider understanding of exploitation and vulnerability. The wording of this action is confusing and appears to conflate the experiences of those who are victims of hate crime with those who have been criminally exploited. They are not the same.

The sub-actions in this workstream concentrate solely on victims of exploitation. There are no sub-actions that consider the experiences of victims of hate crimes, as well as limited detail on deliverables that will achieve specified outcomes.

⁵³ *Homicide in England and Wales: year ending March 2022*, Office for National Statistics, 9 February 2023 [Internet, last accessed May 2023]

⁵⁴ *The Ethnicity of Missing People: Findings from police and local authority data, 2021-22*, Missing People, February 2023 [Internet, last accessed May 2023]

National Black Mentoring Scheme

Establishing a National Black Mentoring Scheme where peer mentors from Black communities work with senior police personnel to improve understanding and engagement.

Police Race Action Plan

We have several concerns about the proposed National Black Mentoring Scheme suggested in the Plan.

First, the scheme was included in the Protection workstream because the Race Action Plan team believed it is important for officers to understand perceptions of others with different lived experiences, which would, in turn, support them in being more empathetic. However, this activity is more aligned with the Internal Culture and Inclusivity, and Community Engagement workstreams.

Second, the mentoring scheme has no defined structure yet, however, they have mentors on board who are registered based on their interests rather than expertise or suitability. We have concerns about the validity of the mentors and the delivery of this scheme. The role of a mentor is to provide guidance, support and role development/modelling. This requires appropriate training.

We have seen no parameters around the process and structure of the mentoring scheme, which leads us to question how the Programme is determining the qualities they seek to develop in mentors. This ought to have been developed before mentor selection.

Finally, resourcing is a concern in this workstream. The progression of other actions outside of the mentoring scheme is slow. We are concerned that the focus on this action is taking away from other areas that are better suited to this workstream and ought to be treated as a priority.

Refreshing Crime Prevention Plans

Work to refresh crime prevention plans appear to be in its infancy with many of the tasks already past set deadlines. We note that the concentration of work with external stakeholders in this area is through “ice-breaker” community reference groups. This misses an opportunity to speak to national stakeholders with expertise in vulnerability, the lived experiences of Black people and their concerns about interactions with the police. The scoping for this action is not wide enough for the jurisdiction of this action.

We are also concerned by the lack of response from HMICFRS to this workstream's request for them to include crime prevention within their annual assessment of police efficiency, effectiveness and legitimacy. Embedding elements of the Race Action Plan into existing accountability infrastructure is key to its success.

Awareness of mental distress in Black people

Improving policing's response to vulnerable groups within Black communities, including those at risk of criminal exploitation and people with mental ill health is a key piece of long-term activity that requires embedding into policing and significant collaboration. We are concerned that we have not seen substantial updates on this in the workstream.

There are several key organisations, such as Black Minds Matter, and that work in the sphere of the mental health of Black people. There needs to be clear evidence of working with these organisations to develop and implement work in this area.

Support for missing Black people

It's not clear why this action is not in the priority category for the Programme. There have been a series of high-profile cases around the treatment of the families of Black people who have been reported missing and the missing people themselves.

On 7 March 2023, the charity, Missing People, published a report, *The Ethnicity of Missing People*, which found that Black people are over-represented (at 13%) both as missing individuals and in missing incidents, despite making up 4% of the UK population.⁵⁵ It also found that Black children with mental health issues are less likely to be identified as being at risk; are missing for longer periods of time; are less likely to be found.

⁵⁵ *The Ethnicity of Missing People: Findings from police and local authority data, 2021-22*, Missing People, February 2023 [Internet, last accessed May 2023]

The contributing factor to this being the adultification of Black children by the police, leaving one of the Black communities' most vulnerable groups without the protection they require and at greater risk of exploitation and trafficking. The report raises significant concerns and has serious implications for the police and how it supports vulnerable Black people, and for the reiteration of the Plan.

Going forward, we believe that the Community Engagement and Protection workstreams must work more closely to explore the role of community engagement in helping to find missing people and conducting scrutiny by monitoring police performance.

Funding for effective outcomes

We have received limited information on the Plan's action to work with PCCs and departments across government to explore opportunities to secure additional funding to support more effective outcomes for Black people. We believe that this action should be treated as an approach that sits across all four workstreams, and indeed, is fundamental to the Race Action Plan. We would like to see regular and detailed updates on the progress of this activity communicated to the ISOB and the public.

Stakeholder Engagement

Similar to other workstreams in this Programme, stakeholder engagement with organisations external to policing has been limited. It is unclear which key external stakeholders have been engaged by the Programme with key organisations in this space - e.g., Catch22, Victim Support – as well as civil society groups and youth groups not mentioned in project briefs or updates.

The remit of this workstream is extremely sensitive with many of the targeted beneficiaries belonging to vulnerable groups including victims of hate crime, trafficked persons, and people suffering from mental distress. Work in these areas will require relationship-building with external agencies, and those with lived experience, and efficient cross-working with national leads within policing to be truly meaningful and sustainable.

These relationships must start to be fostered now, and requires the police having to take a step back and embark on significant listening exercises.

Resources

The team appears to have engagement at a local level through “ice-breaker” forces who demonstrate a willingness to deliver the Plan. We note that resourcing was highlighted as a concern by the Protection workstream coordinators at the Programme Board meetings on 24 November 2022 and December 2022.

We are deeply concerned about the lack of resourcing available for this workstream. It is a key workstream for the Race Action Plan. The police's failure to recognise the vulnerability of Black people is a key contributing factor to the erosion of their trust and confidence in the institution.

It is crucial to the success of the Plan that staff tasked with the operational delivery of it are provided adequate time and budget in order to be effective in their roles.

“Excessive use of force by police can have a serious long-term impact on the mental health of young people. Most encounters with police do not involve excessive use of force. Despite this our research suggests that when excessive force is used it can have a damaging long-term impact on the emotional well-being of those it targets. Academic research talks about the ‘asymmetrical’ impact of negative encounters with police. This means that these negative experiences have a much bigger impact than positive experiences. Our research suggests that this could partly be due to the trauma caused by excessive use of force.”

Policing In Hackney, Challenges from Youth in 2020, (2020, Hackney Account)

Reiteration of the Plan

It is important that the reiterated Plan demonstrates a developed understanding of Protection and the many complexities that underpin it. Interrogating the role the police plays in failing vulnerable people and leaving them susceptible to becoming suspects in future, will be key to this.

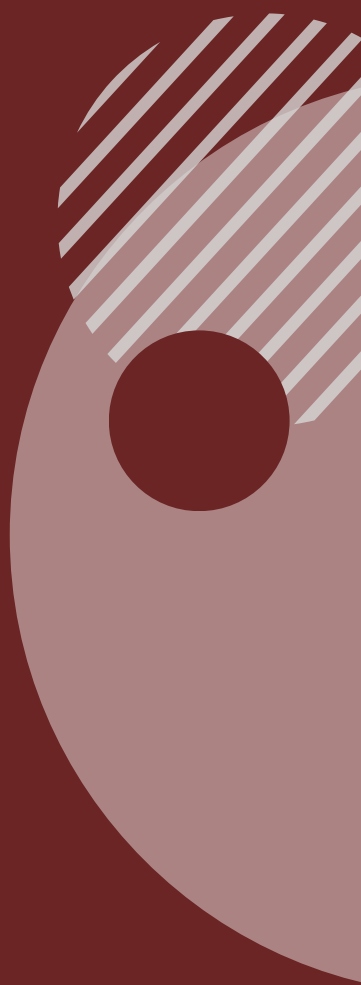
We would also expect to see evidence of improved connections with the other workstreams. Cross-working is needed with the Use of Powers workstream as over-policing can be seen as a form of under-protection. As well as linking with pieces of work that exist in wider policing, for example, the use of out-of-court disposals; and a clearer drive towards the incorporation of restorative justice models.

There needs to be clarity in identifying the key stakeholders outside of policing for each action and how their work is being incorporated into the reiteration and implementation of the Plan. This will enable the reiterated Plan to be dynamic and shaped by communities and trusted experts in this area.

Next Steps for the Protection Workstream

The appointment of a new coordinator for this workstream provides an opportunity to reflect on the progress made thus far and to undertake activity which will have impact. We recommend the new workstream coordinator:

- ✓ Establish clear metrics for the Protection workstream and ensure that they capture the necessary data and provide sufficient foundations for action.
- ✓ Prioritise the embedding of the Protection workstream across the other workstreams, particularly Community Engagement and Use of Powers.
- ✓ Establish clear metrics for the proposed Mentoring Scheme to ensure that it is effective in producing desired outcomes.
- ✓ Identify the crime types and locations to facilitate understanding of the impact of crime on Black people.



10

DATA AND EVIDENCE



“It’s important to say too that gaps have real implications - they aren’t academic. A lack of data often means people’s experiences aren’t recorded, institutions aren’t held accountable, and ultimately the criminal justice system doesn’t work for everyone.”

Data and Statistical Gaps in Criminal Justice, Centre for Public Data (2023)

Analysis and data gathering are split into two workstreams in the programme delivering the Plan. The first, Performance and Data, seeks to identify and fill data gaps in each of the workstreams. The second, Evidence and Evaluation, is focused on measuring the effectiveness and relative success of the interventions put forward in the Plan. These are both “enabling” workstreams and cut across the four main workstreams of the Plan.



The Performance and Data workstream has benefited from the additional funding in the Police Uplift Programme and has supported the recruitment activity in the Internal Culture and Inclusivity workstream. This workstream was also behind the publication of the PRAP survey results in February 2023.

We continue to receive regular updates on the National Police Data Transparency Survey and the National Data Standards for Protected Characteristics. The work here is positive and will enable forces to be held to account. That said, we have made it clear to the programme that the next iteration of the plan should set out clear measures for success.

Areas of concern

Lack of measurable actions

The Plan does not outline what outcomes the actions it proposes are seeking to deliver. The actions need to be turned into metrics that can be used to measure success. Similar to this, we have fed back to the Race Action Plan about the need for the evaluation to be brought to the chapters more comprehensively.

Data collection

Participants in our Accountability Forum sessions highlighted frustrations about the need for data collection. We have raised these concerns and highlighted the fact that data collection should not be used as an excuse to delay action.

The impact of personnel changes

Overall, this work is progressing well and the workstream coordinators are capable and seem to be personally invested in the work. Nevertheless, as with other areas of the Plan, personnel changes have led to extended periods where these workstreams have been under-resourced. We would like to see the Programme undertake better succession planning and ensure adequate handover.

Articulating impact

There is a risk in the Plan and in the Programme of focusing heavily on delivering large quantities of research but not stating what impact this work is having, or producing data that shows that the plan and the initiatives are moving the needle. What is done with the data is what will demonstrate movement and this workstream has to proactively demonstrate this.

Reiteration of the Plan

We would like to see impact centred and prioritised. The Programme must undertake an interrogative approach and continually ask itself key questions such as what is the impact of the Programme and how can we measure the success of this. The next iteration of the Plan must outline how data will measure performance and how this evidence will support the evaluation of the actions.

We understand that the Evidence and Evaluation workstream has developed an evaluation strategy, and we want to see this published alongside the publication of the reiterated Plan.

In addition, whilst we have received regular updates on the National Police Data Transparency Survey and the National Data Standards for Protected Characteristics, we have made it clear to the Programme that the next iteration of the Plan should outline clear measures for success as well as routinely published data that tracks progress.



11

GLOSSARY



Accountability Forum

Established in 2022 by the ISOB, the Accountability Forum⁵⁷ consists of individuals, organisations, leaders in local communities. The Forum holds the ISOB to account and to highlight work in forum members' areas of work. Themed online sessions for each workstream ran in Autumn 2022.⁵⁸

The Baroness Casey Review

The Casey Review was 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 Sarah Everard was killed by a service officer in March 2021. The review began in February 2022 and completed in March 2023, and found institutional racism, sexism, and homophobia in the Metropolitan Police

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.

Direct discrimination

"The Equality Act 2010 states that direct discrimination occurs where the reason for a person being treated less favourably than another is a protected characteristic. This definition is broad enough to cover cases where the less favourable treatment is because of the victim's association with someone who has that characteristic (for example, is disabled), or because the victim is wrongly thought to have it (for example, a particular religious belief).

Disproportionate

When something is too large or too small when compared with something else.

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.

HMICFRS

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (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.

IAGs

Independent Advisory Groups (IAGs) are made up of members of the public who meet to advise and offer ideas to police forces on a wide range of activities relating to local policing. The main role of an IAG is to act as a 'critical friend' to the police.

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.

Intersectionality

A framework for conceptualising a person, group of people, or social problem as affected by several discriminations and disadvantages. It considers people's overlapping identities and experiences in order to understand the complexity of prejudices they face.

IOPC

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.

The National Black Police Association

The National Black Police Association (NBPA) seeks to improve the working environment of Black staff by protecting the rights of those employed within the Police Service and to enhance racial harmony and the quality of service to the Black community of the United Kingdom.

⁵⁷ [Accountability Forum Launch](#), Independent Scrutiny & Oversight Board, July 2022

⁵⁸ [Accountability Forum Workstream Discussion Sessions](#), Independent Scrutiny & Oversight Board, September - November 2022

Nolan Principles

The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

The principles are:

- **Selflessness:** *Holders of public office should act solely in terms of the public interest.*
- **Integrity:** *Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.*
- **Objectivity:** *Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.*
- **Accountability:** *Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.*
- **Openness:** *Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for doing so.*
- **Honesty:** *Holders of public office should be truthful.*
- **Leadership:** *Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.*

NPCC

National Police Chiefs' Council (NPCC) brings UK police leaders together to set direction in policing and drive progress for the public.

Operation Hotton

Operation Hotton was a series of nine linked independent investigations concerning serving police officers from the Metropolitan Police Service, (MPS). Most officers held the rank of police constable and were predominantly based at Charing Cross Police Station. The two year investigation found evidence of racism, misogyny, harassment and bullying.

Police and Crime Commissioners

Police and Crime Commissioners (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.

Police Federation of England and Wales

The Police Federation of England and Wales is the staff association for police constables, sergeants and inspectors (including chief inspectors). It is one of the largest staff associations in the UK representing more than 130,000 rank and file officers.

Programme Board/Race Action Programme

The Programme Board is entrusted with the delivery of the national Race Action Plan.

Protected Characteristics

The following are protected characteristics under section 4 of the Equality Act 2010: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Racism

The official report of the Stephen Lawrence Inquiry states that 'Racism in general terms consists of conduct or words or practices which disadvantage or advantage people because of their colour, culture, or ethnic origin. In its more subtle form it is as damaging as in its overt form.'

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.

ABOUT THE INDEPENDENT SCRUTINY AND OVERSIGHT BOARD (ISOB)

The Independent Scrutiny and Oversight Board (ISOB) exists to provide overview and external scrutiny of the Police's Plan of Action.

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

Senior Program Officer at Open Society Foundations. Nick leads work on police accountability and justice in Europe, covering police powers, police use of force/violence, protest, drug policy reform, mandatory detention and discrimination within the criminal legal system.



KATRINA FRENCH
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.

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