

Equality Framework for Police and Crime Commissioners and their Offices

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Introduction

This Framework is designed to support APCC members with their legal equality duties.

Police and Crime Commissioners, Police Fire and Crime Commissioners, Deputy Mayors for Policing and Crime and Chairs of relevant Authorities (hereafter 'PCCs') and their offices are subject to the Public Sector Equality Duty contained within the Equality Act 2010. PCCs are subject to the general duty, which means that in the exercise of their functions, they must have due regard to:

- The need to eliminate unlawful discrimination.
- Advancing equality of opportunity.
- Fostering good relations between people who share a protected characteristic and those who do not.

PCCs are also subject to the specific duty, which requires them to publish equality information annually to demonstrate compliance (organisations with fewer than 150 employees are exempt from publishing information about employees), and to publish one or more specific and measurable equality objective(s) every four years.

Furthermore, the Police Reform and Social Responsibility Act 2011 requires PCCs to hold the Chief Constable in their area to account for the exercise of duties relating to equality and diversity.

How To Use the Framework

The framework below is designed to assist and support PCCs in meeting both the duties as described above that apply to them and their role in holding the Chief Constable to account for their duties under the Equality Act. This framework is based closely on the [Equality Framework for Local Government](#), as developed by the Local Government Association. In line with commitments within the [APCC Strategic Plan](#), the framework aims to support PCCs in eliminating discrimination, advancing equality of opportunity and fostering good relations between communities.

The APCC hopes that PCCs and their offices will be able to use this framework to assess their current performance in terms of meeting their obligations under the Equality Act and to understand the steps they can take in order to improve their performance in this area. We would encourage our members to evaluate, monitor and scrutinise any actions they implement resulting from this resource.

The framework includes four sections:

- Understanding and Working with your Communities.
- Leadership and Organisational Commitment.
- Responsive Services.
- Diverse and Engaged Workforce.

For each section there are three levels: Developing; Achieving and Advancing. The levels are progressive and cumulative so a PCC and their office (together referred to as OPCCs in this document) can plan and chart their progression against different priorities. An OPCC accomplishes a level when they achieve the criteria of that level. For example, OPCCs who are on the “achieving” level should be accomplishing all the criteria set out in the Developing and Achieving levels. OPCCs can be at different levels of the framework depending on the section.

- **Developing** - The Developing level criteria contains the basic building blocks for each priority. An OPCC at the Developing level has made an organisational commitment to improving equality. It is putting in place processes to deliver on equality issues and is working towards meeting and exceeding its statutory requirements.
- **Achieving** - An OPCC at the Achieving level has policies, processes and procedures in place and is delivering some good equality outcomes. It is not only meeting but can demonstrate exceeding statutory requirements.
- **Advancing** - An OPCC at the Advancing level has put equality at the heart of its work and output, and can demonstrate that it is delivering significant improvements for all the communities that the PCC serves. The OPCC exceeds statutory requirements, but is an exemplar for other police governance bodies and the wider public sector.

The sections contain several themes, each with a short descriptor at each level of the framework. This is followed by a set of indicators or criteria that can be used to self-assess.

Understanding and Working with your Communities	Leadership and Organisational Commitment	Responsive Services	Diverse and Engaged Workforce
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Collecting and Sharing Information	Leadership	Commissioning Services	Workforce Diversity
Analysing and Using Data and Information	Priorities and Partnership Working	Service Delivery	Inclusive Strategies and Policies
Effective Community Engagement	Assessing Equality Impact in Policy and Decision Making		Learning and Development
Fostering Good Community Relations	Equality Objectives and Annual Reporting		Health and Wellbeing
Participation in Democracy	Monitoring Performance on Equality Objectives		

Updates

This is a living document that is updated on an approximately annual basis. If you have any feedback, please get in touch with richard.denham@apccs.police.uk. Below is a summary of substantive updates carried out on the Framework since it was first published:

March 2023 Update

Following discussion at a meeting of the APCC Race Disparity, Equality, and Human Rights Portfolio Group in November 2022, this framework was edited to:

- Suggest steps that its members can take to improve the service they provide specifically to victims from ethnic minority backgrounds. This aims to put the framework in line with relevant Ministry of Justice guidance and the NPCC and College of Policing's Police Race Action Plan.

- Reflect concerns relating to the use of Artificial Intelligence (AI) in policing. AI is the science and practice of using algorithms to automate processes, analyse data and support decision-making or the delivery of services and information. Its deployment in policing is often allied to the use of new biometrics for identification such as face, iris and voice recognition.

October 2024 Update

In December 2023, the APCC reached out to its members to coordinate a response to the [HMICFRS, IOPC, and College of Policing report](#), issued in response to the Criminal Justice Alliance’s super-complaint on the use of Section 60 Stop and Search. We asked members if they would support amending the Framework to incorporate the criteria from Recommendation 8, which addresses community scrutiny groups for PCCs. 95% of our members said yes, therefore criteria have been added in relation to panels to the section entitled “Effective Community Engagement” (3.1-3.3).

The Framework has been updated following extensive feedback received by the Equality & Human Rights Commission, including featuring more criteria in relation to discrimination, harassment and scrutiny of AI.

Understanding and Working with your Communities

Collecting and Sharing Information

Developing	Achieving	Advancing
<p>1.1. Relevant, proportionate and appropriate information about the local population and their protected characteristics is regularly gathered and updated.</p> <p>Plans are in place to collect, share and use equality information with the force and other partners.</p>	<p>1.2. The OPCC and/or force has gathered and published information and data on the profile of the force area. They have also published relevant information regarding equality, e.g., use of police powers/use of force broken down by ethnic group; information on workforce diversity.</p> <p>Information is shared across the OPCC, the force and with relevant partners actively.</p>	<p>1.3. A comprehensive set of information about local communities/protected characteristics. Needs and outcomes are regularly updated, published and used to inform the PCC's equality objectives and other priorities (as outlined in the Police and Crime Plan).</p>
Criteria		
<p>The OPCC is clear about what sources of information (both local and national) are relevant and useful.</p> <p>The PCC has set at least one clear, ambitious, and measurable equality objective for their office and the force (in line with their duties under the Equality Act 2010).</p>	<p>National, regional and local data is used and analysed.</p> <p>The OPCC is working with the force and other partners to address identified gaps in information.</p> <p>Data from the Youth Justice Board's Summary Disproportionality Tool is used to inform decision-making and priority-setting.</p>	<p>Changing needs are identified and prioritised across a wide range of services and outcomes. For example, referring to the Equality and Human Rights Commission's Equality Measurement Framework.</p> <p>Data is regularly updated and used to set equality objectives and wider priorities for the force and the services that the PCC</p>

<p>The OPCC has accessed the Youth Justice Board’s Summary Disproportionality Tool via the Knowledge Hub, administered by the APCC, to understand ethnic disparities in the Youth Justice System.</p> <p>The OPCC knows what information is already being collected – internally and by its partners - including voluntary and community-sector stakeholders.</p> <p>The organisation is working with the force and other partners to ensure information is shared effectively. Partners ensure efficient collection of data that avoids duplication.</p> <p>The OPCC is compliant with General Data Protection Regulation (GDPR) legislation in its collection, analysis, storage and use of data and information.</p> <p>The PCC has challenged the force to carry out an audit of the use of police powers that impact disproportionately on Black communities, including authorisations of the use of section 60 under the Criminal Justice and Public Order Act.</p>	<p>There are robust and effective protocols in place for sharing information between partners to ensure compliance with GDPR.</p> <p>The PCC has challenged the force to build an evidence base on disparities impacting Black communities locally, or any other group locally who may experience disparities in terms of policing and criminal justice.</p> <p>The PCC is confident that the force has developed an action plan to address disparities in the use of police powers and engaged with national bodies including the NPCC and the College of Policing for support.</p>	<p>commissions, regarding groups within the force area with protected characteristics.</p> <p>There is evidence that disparities are being reduced through actions taken by the PCC, thanks to accessing resources such as the Youth Justice Board’s Summary Disproportionality Tool.</p> <p>The OPCC is working with partners to ensure that changing needs are identified and met; third sector organisations and community groups are actively involved.</p> <p>The PCC has ensured that the force has developed an accurate understanding of race disparities which impact on Black people in their communities locally and is satisfied that the force is able to demonstrate improved outcomes for Black people.</p> <p>Disparity in the use of powers has decreased, attributable to action taken by the PCC and the force.</p>
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Analysing and Using Data and Information		
Developing	Achieving	Advancing
<p>2.1. The PCC is holding the force to account to ensure that processes are in place to analyse soft and hard data/intelligence about groups with protected characteristics, including how they are impacted by crime, the use of police powers and their levels of confidence in policing.</p>	<p>2.2 Information and data are disaggregated and analysed to support the assessment of local need, to inform priorities for the police force and other commissioned services.</p>	<p>2.3 Up-to-date and comprehensive equality data is used regularly to inform the PCCs' priorities for the force – including the PCC's equality objectives - to hold the force to account, and to inform decision-making about funding and commissioned services.</p>
Criteria		
<p>The organisation is developing and improving systems for collating and analysing data and intelligence from communities.</p> <p>The PCC has engaged with the Chief Constable to ensure that where possible all Stop and Search and other use of powers/force records include detail of the self-defined ethnicity of the subject.</p> <p>Data is published and easily accessible about police use of powers (e.g. Stop and Search) and police use of force (e.g. TASER use), particularly regarding their use on</p>	<p>The PCC uses data on use of force and Stop and Search to hold the Chief Constable to account for addressing any ethnic disparities that exist when the force uses these powers.</p> <p>Data is used to hold the Chief Constable to account for their Equality Objectives.</p> <p>In areas with smaller Black, Asian, and Minority Ethnic communities, targeted qualitative work is carried out by the force or OPCC to assess confidence levels.</p>	<p>There is evidence of gaps being narrowed in terms of local disparities and inequalities.</p> <p>Performance is monitored against equality objectives for the OPCC and commissioned services. The PCC also actively holds the Chief Constable to account for achieving the force's equality objectives.</p> <p>The OPCC reports to the public how their holding to account has impacted performance as part of the annual report process.</p>

people who are Black, Asian, and/or Minority Ethnic.		
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Effective Community Engagement		
Developing	Achieving	Advancing
<p>3.1 The OPCC is working outwards and developing inclusive community engagement structures. All communities within the force area have equal opportunity to have their voices heard by the PCC.</p>	<p>3.2 The OPCC has developed an inclusive community engagement structure, and engages with all its communities when making decisions, including those with protected characteristics. Engagement mechanisms and structures are in place to involve communities and scrutinise the force (particularly regarding police use of powers and force) on equality objectives.</p>	<p>3.3 Formal and informal interactions take place between the OPCC and its diverse communities. Diverse communities from across the force area are actively participating in and influencing decision making.</p>
Criteria		
<p>The OPCC has an engagement strategy. It is clear about different levels of engagement (i.e. informing, consulting, participating, co-producing) and when these are appropriate.</p> <p>There are opportunities for protected groups to be engaged with decision making and the OPCC can evidence examples of these opportunities.</p>	<p>People with protected characteristics are encouraged and enabled to participate in decision making and scrutiny processes, such as community scrutiny groups.</p> <p>Policies, practices, and/or decision-making processes have changed where necessary as a result of engagement – with both communities and voluntary sector organisations - with a clear and demonstrable evidence basis.</p>	<p>There are a range of innovative approaches to involving communities and arrangements are made to meet specific or individual needs.</p> <p>There is evidence that mainstream engagement mechanisms are increasingly involving previously under-represented groups.</p>

<p>Shared engagement structures/mechanisms are in development with partners, including commissioned services and third sector organisations.</p> <p>A community scrutiny group is in place in the force area which scrutinises police use of powers and force. The group is chaired by an independent member of the public. Panel membership and vetting arrangements have been reviewed to remove any unnecessary barriers to recruiting, particularly for those with lived experience of being subject to police powers.</p> <p>TASER use is closely scrutinised at the local level, particularly its deployment against specific groups, including individuals from Black, Asian, and minority ethnic backgrounds, those experiencing mental health challenges, and children. This scrutiny involves data analysis, regular reviews of body-worn video footage, and dip-sampling.</p> <p>The OPCC engages with staff networks within the force that represent police staff</p>	<p>Engagement structures and mechanisms are actively increasing stakeholder and voluntary and community sector involvement in informing priorities</p> <p>The PCC challenges the Chief Constable to ensure that local communities - particularly those which historically have lower confidence in the police - are regularly engaged with on force decisions around TASER use and provided with opportunities to inform force policy, practice, guidance, and training. Members of impacted communities are able to understand how their input has influenced force policy.</p> <p>Where there is very limited or no actual representation within a local demographic, the ability to cater for, appreciate, and celebrate difference is in evidence.</p> <p>The OPCC actively monitors underrepresentation in community scrutiny processes, and seeks to take remedial action to involve underrepresented groups in future engagement.</p>	<p>Staff and stakeholders can describe levels of influence within the community and changes made as a result.</p> <p>The OPCC and the force are viewed by groups with protected characteristics as being open to challenge and constructive criticism.</p> <p>OPCC engagement with staff networks within the force that represent police staff and officers with protected characteristics (e.g. Black Police Associations, LGBT+ Networks, faith networks) actively feeds into the PCC's scrutiny and oversight functions.</p> <p>The OPCC or the force has reviewed membership and vetting arrangements regarding community scrutiny groups, have removed any unnecessary barriers to recruiting, and consequently seen increased representation, involvement and retention of those with lived experience of being subject to police powers.</p> <p>Demonstrable progress has been achieved in terms of delivering for Black communities.</p>
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<p>and officers with protected characteristics (e.g. Black Police Associations, LGBT+ Networks, faith networks) to understand their perspectives and concerns.</p> <p>Where applicable, community scrutiny panels can review authorisations of Section 60 ('suspicionless' Stop and Search) under the Criminal Justice and Public Order Act 1994, and their associated impact assessments and relevant complaints.</p> <p>Community scrutiny group members receive training in a structured and periodic way (e.g., induction and regular refresher training), and are signposted to support in terms of carrying out their role (e.g., counselling).</p> <p>Data on disproportionality in the use of police powers is published on the force/OPCC website, at least annually.</p> <p>Community scrutiny groups can effectively scrutinise data in relation to the deployment of AI within forces, to ensure that technology is being used proportionally and without discrimination.</p>	<p>The PCC has challenged the force to work alongside its local Black Police Association, Race Equality Network, and other relevant partners, to review relevant local policies, guidance, and training delivery with regard to areas including delivering appropriate services to Black people who are victims of crime, delivering appropriate care to missing people from the Black community, and to delivering the most appropriate care to Black people experiencing mental ill-health.</p> <p>Similar steps have been taken to work with staff associations and other bodies to review relevant policies in relation to other groups with protected characteristics.</p> <p>Authorising officers of Section 60 orders attend community scrutiny group meetings to explain decision-making processes and hear feedback.</p>	<p>Members of the public serving on community scrutiny groups are provided financial compensation for their time.</p>
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Fostering good community relations		
Developing	Achieving	Advancing
<p>4.1 The OPCC, the force and its partners are actively engaged in planning and delivering activities that foster good relations.</p>	<p>4.2 Structures are in place within the OPCC and the force and/or Community Safety Partnerships (CSPs) to understand community relationships. Community confidence and cohesion are made explicit priorities for the CSP.</p>	<p>4.3 The OPCC takes a sophisticated approach to fostering good relations which has resulted in measurable improvements in relationships between diverse communities, and increased confidence in policing and the Criminal Justice System amongst communities which have reported low confidence previously.</p>
Criteria		
<p>Community Safety Partnerships actively foster community cohesiveness, monitor community tensions and measure community trust.</p> <p>OPCC communications promote positive relations and reflect the demographics of the force area.</p> <p>The PCC has engaged with the force to ensure that there are effective internal monitoring processes on the use of force, to help them identify and understand disproportionate use.</p>	<p>The OPCC frequently engages with the force to understand levels of harassment and hate crime specifically, within its broader understanding of community tensions and confidence.</p> <p>Data is accessed in terms of hate crime, victims and disaggregated in terms of protected characteristics. Commissioning decisions are made in response to the data.</p> <p>Oversight and Scrutiny functions are used to scrutinise and challenge the performance of the force on progressing</p>	<p>Evidence shows that there has been an improvement in community confidence in the police force.</p> <p>The PCC plays a leading role in bringing the partners and the community together if there are serious incidents of hate crime, whilst ensuring that the force takes action to provide appropriate and sensitive community reassurance.</p> <p>The PCC supports development of local hate crime impact statements by protected characteristic for use in wider CJS/sentencing.</p>

	<p>the equality objectives set by the PCC in the Police and Crime Plan.</p> <p>Information about scrutiny functions, e.g., community scrutiny groups, is easily accessible to the public.</p>	
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Participation in democracy		
Developing	Achieving	Advancing
<p>5.1 The organisation has a clear understanding of the level of awareness regarding the PCC role in policing and criminal justice services amongst all communities within the force area, including amongst people with protected characteristics.</p>	<p>5.2 Local people are encouraged to participate in community engagement activities. Particularly groups who are currently under-represented within engagement processes.</p> <p>The OPCC uses a range of different methods and can innovate to find new ways of making the public aware of the PCC role and how they can ‘have their say’ in policing.</p>	<p>5.3 There is an improvement in the participation rates of under-represented groups in OPCC and force community engagement processes.</p> <p>The OPCC can demonstrate that people across a range of protected characteristics are able to influence decisions and are aware of the PCC’s role and functions.</p>
Criteria		
<p>Information/data is gathered about people who engage with the PCC/OPCC as appropriate.</p>	<p>There is evidence that improvements have been achieved in terms of awareness of the PCC role amongst all communities.</p>	<p>More people from under-represented groups are participating across a wider range of activities organised by the PCC.</p>

Leadership and Organisational Commitment

Leadership

Developing

6.1

The PCC has publicly committed to reducing inequality, fostering good relations and challenging discrimination.

Achieving

6.2

The PCC and senior leaders within the OPCC demonstrate personal knowledge and understanding of all the communities they represent and continue to show commitment to reducing inequality and disparities, meeting their duties under the Equality Act.

Advancing

6.3

PCCs have gained a reputation within the community and with all its partners for championing equality, balancing competing interests and fostering good community relations.

Criteria

The PCC has stated their commitment to a diverse workforce within their Police and Crime Plan, holds the Chief to account for ensuring that the workforce is able to serve diverse communities and ensures that victims services are able to meet the needs of all victims.

The PCC has held the Chief Constable to account for ensuring that there is an anti-harassment and victimisation policy in place for the force, in line with the [Equality & Human Rights Commission's guidance on harassment at work](#).

The PCC and senior members of staff within the OPCC can demonstrate their commitment to equality in decision-making.

Equality objectives are set and published for the force area, with the PCC and senior members of OPCC staff having ownership for the actions.

The PCC has challenged the Chief Constable to ensure that staff networks

The OPCC can show that even when making difficult decisions, it continues to demonstrate a clearly articulated and meaningful commitment to equality.

Staff, the community or the voluntary and community sector can offer good examples of how effective communication and engagement within the OPCC has enabled better outcomes for communities in the area relating to equality.

<p>The PCC has publicly committed to improving equality in their area and tackling disparities in policing and criminal justice, including reducing disparities in the use of police powers and use of force.</p> <p>The OPCC has established and publicised a strong case for its equality work in the context of crime reduction.</p> <p>The PCC holds the Chief Constable effectively to account for gaining the confidence of all the communities they serve, as well as for their duties in relation to equality and diversity.</p> <p>The PCC is working with the Chief Constable to develop a clear joint strategy on equality, diversity and inclusion, building on their equality objectives.</p> <p>The PCC is aware of the NPCC and College of Policing Police Race Action Plan and has raised it with their Chief Constable.</p> <p>In terms of the use of AI, the PCC has held the Chief Constable to account for ensuring that the force has fully</p>	<p>are involved in the development of the force’s anti-harassment policies.</p> <p>Senior leaders ensure that publications, websites and other communications channels reflect diverse communities and are accessible.</p> <p>The PCC has published alongside the Chief Constable a clear joint strategy on equality, diversity and inclusion.</p> <p>The NPCC and College of Policing Police Race Action Programme is raised periodically with the Chief Constable to drive progress locally.</p> <p>The PCC has actively held the Chief Constable to account in terms of ensuring that the force conducts its own equality impact assessment of the use of AI and other technology (rather than outsourcing this to the third-party technology provider).</p> <p>The PCC has challenged the Chief Constable to ensure that the force’s internal lead on the Public Sector Equality Duty is aware of how AI and other technologies are being deployed and is</p>	<p>The PCC is confident that the Chief Constable has provided officers and staff every opportunity to raise issues with them in relation to harassment, victimisation, including through informal one-to-ones, open door meetings with senior management and exit interviews.</p> <p>The PCC has published, alongside the Chief Constable, a clear joint strategy on equality, diversity and inclusion, building on the equality objectives that they have set locally. There is evidence that this has driven improvements.</p> <p>The PCC is confident that the force can demonstrate clear local progress on the aims of the NPCC and College of Policing Police Race Action Plan.</p> <p>The PCC has challenged the Chief Constable to ensure that Equality Impact Assessments in the relation to the deployment of AI are kept under ongoing review to keep abreast of ongoing developments.</p> <p>The PCC has put in place a high-level Ethics committee, comprised of suitably</p>
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<p>implemented the Equality & Human Rights Commission’s guidance on artificial intelligence in public services.</p> <p>The PCC is actively holding the Chief Constable to account at the local level in ensuring that risks relating to algorithmic bias are being appropriately managed.</p> <p>The PCC has requested the Chief Constable to notify them of any deployments in the use of AI.</p> <p>The PCC holds the Chief Constable to account to ensure that where AI is deployed, data is published for public scrutiny.</p>	<p>actively monitoring for any potential ramifications regarding the force’s equality duties.</p> <p>The PCC has ensured that outcomes resulting from AI deployments are analysed for effectiveness.</p> <p>The PCC has challenged the Chief Constable to ensure that deployments of AI are in accordance with the Human Rights Act, in particular Article 8 (Privacy) and Article 10 (Freedom of Expression)</p> <p>The PCC uses national reports - such as, but not limited to, IOPC learning reports, HMICFRS, IOPC and College of Policing reports in response to super-complaints and the Angiolini Review – to hold the Chief Constable to account, and as opportunities to understand lessons for the force.</p>	<p>trained and qualified members of the public, who are able to support PCCs/Chief Constables in emerging technologies such as AI, that will complement community scrutiny groups which focus on scrutinising individual incidents.</p> <p>Action Plans are put in place in response to recommendations made in national reports and/or actions are incorporated into existing relevant Action Plans that the force is already progressing.</p>
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Priorities and Partnership Working		
Developing	Achieving	Advancing
7.1	7.2	7.3

Partnership working arrangements are being reviewed with service providers, the voluntary and community sector and the wider community to ensure that a range of people's perspectives can be fed into OPCC planning.	There is a coherent, shared vision of equality for the local area, with clear priorities which have been agreed and understood by all key stakeholders, including the voluntary and community sector. These are reflected in the PCC's equality objectives.	The organisation can demonstrate success in working with partners in the public, private, community and voluntary sectors to drive progress on equality objectives, which are reviewed on a regular basis.
Criteria		
Corporate and partnership documents capture the commitment of the organisation and partners to equality, with commitments to equality and diversity included into Terms and Conditions for contracts and procurement.	There are shared equality priorities, objectives and outcomes for the local area which are understood and acted on at all levels within the OPCC, as well as across partners and service providers. The organisation and its partners monitor, review and evaluate performance against equality priorities in policing and criminal justice.	Staff, the community or the voluntary and community sector can give good examples of improved outcomes and reducing disparities in policing and criminal justice. The community or the voluntary and community sector are involved in strategic planning on a co-design basis .

Assessing Equality Impact in Policy and Decision Making		
8.1 Due regard is taken about the PCC's equality objectives, which set out how the PCC will meet the aims of the General Equality Duty when making decisions and when setting policies.	8.2 Equality analysis and impact assessment is integrated systematically into planning and decision making across the OPCC, rooted in the PCC's equality objectives.	8.3 The OPCC can demonstrate that improvements in equality outcomes are being delivered because of effective equality analysis and impact assessment and that negative impacts have been mitigated.
Criteria		

<p>The OPCC has an agreed approach to conducting equality analysis/impact assessment of policy and service decisions.</p> <p>Equality impact assessments are robust and take account of the views of those affected by the policy or decision.</p>	<p>There is senior level commitment to using and understanding equality analysis/ impact assessment to inform planning and decision making.</p> <p>The OPCC’s assessments are accessible and robust and refer to the PCC’s equality objectives.</p>	<p>The OPCC can demonstrate how equality analysis/impact assessment has been used to identify needs and improve outcomes/reduce disparities in policing and criminal justice.</p> <p>The OPCC can provide evidence of how or where equality analysis/impact assessments have informed decision-making and led to different, targeted services that have improved outcomes.</p>
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Equality Objectives and Annual Reporting		
Developing	Achieving	Advancing
<p>9.1 Equality objectives for the OPCC have been set and published in accordance with the requirements to support the Public Sector Equality Duty.</p>	<p>9.2 Specific and measurable equality objectives have been integrated into organisational strategies and plans – including the Police and Crime Plan – and action is being taken to achieve them. Outcomes are measured and monitored regularly.</p>	<p>9.3 The OPCC can demonstrate a clear link between meeting their equality objectives and positive outcomes for its communities (e.g., increased trust in the police amongst groups that may have previously had lower levels of confidence).</p>
Criteria		
<p>The specific duty within the Equality Act to publish equality objectives has been met, such as the setting of equality objectives and the publication of relevant information.</p>	<p>There is evidence of a link between equality objectives, business planning and performance management.</p>	<p>There is evidence that equality objectives have led to improved outcomes, including for people with protected characteristics.</p>

<p>Equality objectives are underpinned by robust equality analysis and are integrated into organisational strategies and plans, including the Police and Crime Plan.</p> <p>Objectives are SMART – Specific, Measurable, Realistic, Achievable and Timely.</p>	<p>OPCC staff own specific activities to contribute to the achievement of equality objectives and clearly understand how their roles contribute.</p> <p>Progress is regularly monitored and reviewed. Information on the PCC’s progress against equality objectives is publicly accessible.</p>	<p>An annual Equality Report is published by the OPCC, detailing progress on equality objectives.</p>
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Monitoring Performance on Equality Objectives		
Developing	Achieving	Advancing
<p>10.1 Appropriate structures are in place to ensure delivery and review of equality objectives.</p>	<p>10.2 The setting and monitoring of equality objectives is subject to challenge, including through any community bodies or groups and overview/scrutiny processes.</p>	<p>10.3 The OPCC benchmarks its achievements against other comparable organisations and shares its experience in developing good practice.</p>
Criteria		
<p>There is an appropriate and accountable individual at a relevant level of seniority within the OPCC who holds responsibility for the organisation’s equality objectives.</p>	<p>The OPCC has conducted consultation with relevant groups (e.g., community scrutiny groups) in the design of its equality objectives.</p>	<p>The OPCC assesses its performance and outcomes, and those of the force and commissioned victims services, against other OPCCs and forces.</p>

Responsive Services

Commissioning Services

Developing	Achieving	Advancing
<p>11.1 The OPCC ensures that procurement and commissioning processes and practices, particularly in regard to victims’ services, take account of the diverse needs of service users and that providers understand the requirements of the Public Sector Equality Duty and the Social Value Act.</p>	<p>11.2 Mechanisms are in place to ensure that equality standards are embedded throughout the procurement and commissioning cycle.</p>	<p>11.3 The organisation can demonstrate that commissioned and procured services are helping it to achieve its equality priorities. The organisation can show that procurement is ethical.</p>
Criteria		
<p>The OPCC has referred to the Equality and Human Rights Commission’s guidance Buying Better Outcomes on mainstreaming equality considerations in procurement. The PCC has held the Chief Constable to account to ensure that the guidance is being used within the force.</p> <p>Equality Impact Assessments form a key part of the ‘due diligence’ conducted regarding any prospective suppliers. The PCC holds the Chief Constable to account</p>	<p>Specifications take account of the different needs of users, particularly victims accessing support services. For example, through equality analysis/ impact assessments.</p> <p>Commissioned service providers sign-up to the PCC’s equality objectives as part of the procurement process.</p> <p>The ability of victims services to provide specialist support to victims of crime that</p>	<p>There is evidence that performance on equality clauses in contracts is being monitored. The results are considered by both the OPCC and the commissioned services.</p> <p>There is evidence of commissioned services and other providers meeting the PCC’s equality objectives.</p> <p>Providers and commissioned services understand and have articulated a</p>

<p>to ensure this is also the case within the force.</p> <p>There are standard equality clauses for contracts.</p> <p>The PCC is actively considering how best to provide victims services that proportionately reflect the ethnic demographics of their local communities and has undertaken a needs assessment to ensure they are commissioning services that meet the needs of all their communities, such as ethnic minority communities and other groups who share protected characteristics.</p> <p>The PCC is considering how to promote victims services in their areas to ensure that ethnic minority victims are aware of the support available to them.</p> <p>The PCC has underlined to the victims services that they commission the need to conduct Equality Impact Assessments.</p>	<p>particularly affect people with protected characteristics (e.g., hate crime) is taken into account.</p> <p>Monitoring requirements are built into contracts to ensure equality issues are addressed.</p> <p>The OPCC is actively engaging with victims from ethnic minority communities in every stage of their planning and commissioning of victims services to understand their needs.</p> <p>The PCC is actively promoting victims services in their areas to ethnic minority communities, to ensure that they are aware of the support available to them.</p> <p>The PCC is satisfied that the victims services they commission are conducting robust Equality Impact Assessments and that these are used to drive service improvements.</p>	<p>commitment to equality and are engaged with a wide range of communities to understand varying needs.</p> <p>The OPCC is able to demonstrate increased confidence amongst ethnic minority victims to access the victims' services that it commissions.</p> <p>The OPCC has developed an in-depth understanding of the local profile and issues for victims from ethnic minority communities in their area, considering intersects with other protected characteristics. The OPCC is able to demonstrate increased confidence amongst ethnic minority victims to access the victims' services that it commissions.</p> <p>The PCC is satisfied that the force can demonstrate improvements in the way that it responds to Black victims of crime, Black missing people and Black people who are experiencing mental ill-health.</p>
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Service Delivery		
Developing	Achieving	Advancing
<p>12.1 The organisation has systems to collect, analyse and measure how satisfied all sections of the community are with the force and other commissioned services.</p>	<p>12.2 There is evidence that the force and commissioned services are meeting the needs of diverse communities and that take up of services. For example, reporting of crime and accessing victims' services is representative of the wider community.</p>	<p>12.3 The organisation has systems in place to use data and public feedback to adapt priorities for the force, to ensure equity of access and can demonstrate where this has been done.</p>
Criteria		
<p>There are mechanisms in place for members of the public to be consulted about the development of the Police and Crime Plan and priorities for the force.</p> <p>The PCC requires commissioned services to carry out mapping exercises to identify and review current use and take action to ensure all communities are aware of the services they offer.</p> <p>The OPCC collects data about user satisfaction with the force and commissioned services. The mapping and satisfaction data collected is disaggregated by protected characteristics.</p>	<p>Members of the public are consulted effectively during the setting of the strategy for the police force in the Police and Crime Plan and where possible during the commissioning of other services.</p> <p>Accessibility of services is monitored regularly by senior leaders and decision makers.</p> <p>Data about access to commissioned services and user satisfaction is used in equality impacts assessments.</p> <p>Human Rights, as stipulated in the Human Rights Act 1998, are understood and considered when setting the strategy for</p>	<p>Services are co-produced with service users wherever possible, and they are able to influence changes.</p> <p>There are examples of how different users' experiences are analysed and acted upon.</p> <p>Victims' services are able to evidence that they are providing a service that is compliant with equality and human rights legislation and that it specifically meets the needs of ethnic minority communities.</p>

Where possible, complaints about the force made to the OPCC are disaggregated by protected characteristics.	the police force and commissioning services.	
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Diverse and Engaged Workforce

Workforce Diversity

Developing	Achieving	Advancing
<p>13.1 The organisation understands the demographics of the local area and labour market and has mechanisms in place to monitor both its workforce and that of the police force (both officers and staff) against protected characteristics, and to hold the Chief Constable to account to drive further progress.</p>	<p>13.2 The OPCC can demonstrate movement towards greater diversity in both its workforce and that of the police force compared with previous years, including increasing the levels of previously under-represented groups at all levels of the organisations.</p>	<p>13.3 The OPCC actively ensures that the profile of its workforce, that of the force and also those of the services it commissions, broadly reflects the demographics of the community it serves and the local labour market.</p>
Criteria		
<p>The OPCC has begun to identify the steps it needs to take to achieve a diverse workforce within the OPCC and the steps it can take to encourage a more diverse police workforce. These are reflected in recruitment policies and procedures and commitments in the Police and Crime Plan.</p> <p>The progress of protected groups through the organisational hierarchy, both in the OPCC and the Force, is monitored.</p>	<p>Succession plans and recruitment processes actively address under-representation in the OPCC. The PCC is additionally taking steps to address under-representation within the force.</p> <p>The PCC holds the Chief Constable to account for diversity and inclusion across all stages of employment within the force, e.g., attraction, recruitment, retention, progression, grievance and</p>	<p>There are appropriate examples of positive action to improve diversity, both within the OPCC and the force.</p> <p>There is evidence that the workforce profile, at all levels in the OPCC and the force, broadly matches the demographics of the local area and labour market. This is continually monitored and there are reasonable explanations for gaps.</p>

<p>The Chief Constable is held to account for encouraging progression within the force of people from underrepresented groups. Recruitment and selection are monitored at all stages of the process, both within the OPCC and the force, by protected characteristics.</p> <p>The PCC has asked the force to undertake Equality Impact Assessments of local programmes providing training for new recruits (e.g., using the Police Education Qualification Framework model).</p> <p>The PCC uses data from national surveys such as the National Police Wellbeing Survey and the Black Workforce survey, to hold the Chief Constable to account and as a baseline for the force to improve performance locally.</p>	<p>disciplinary, as well as exit from the service.</p> <p>Specific and measurable employment targets have been set to improve representativeness of local demographics in the OPCC. The PCC has challenged the Chief Constable to set targets for the force also.</p> <p>Selection panels – especially those for recruitment of senior positions – are trained in unconscious bias. The training has covered implicit associations and covered bias reduction strategies, in line with EHRC best practice.</p> <p>The PCC has held the Chief Constable to account for ensuring that within the force there is a clear and transparent process which governs promotion opportunities.</p>	<p>Good use is made of flexible working arrangements (where possible) and career pathway initiatives to address potential barriers and under representation.</p> <p>Disciplinary and grievance data in the force and OPCC is similar across all protected characteristics.</p> <p>The force can demonstrate improvements in terms of training programmes for officers.</p> <p>Local workforce surveys are used by the PCC to hold the Chief Constable to account on officer and staff welfare. Performance targets are set based on the results, whilst improvements are actively measured.</p>
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Inclusive Strategies and Policies		
Developing	Achieving	Advancing
<p>14.1 Any OPCC Human Resources strategy includes equality considerations and</p>	<p>14.2 The equality objectives contained within workforce strategies for both the OPCC,</p>	<p>14.3 Prioritised equality outcomes for the OPCC and the force are being achieved.</p>

<p>objectives. The PCC holds the Chief Constable to account for ensuring the same applies to the force.</p>	<p>and the force are implemented and monitored The PCC holds the Chief Constable to account for the implementation of the equality objectives within their workforce strategy.</p>	
<p>Criteria</p>		
<p>All employment policies and procedures comply with the Equality Act. Relevant EHRC guidance has been consulted.</p> <p>New/changing employment policies and procedures are assessed for their impact on people with protected characteristics. All employment and training related policies are regularly evaluated, monitored, and scrutinised for impact in an evidence-based way.</p> <p>The OPCC has a clear policy on use of social media and instant messaging (IM) applications in a professional context, outlining that IM groups set up between colleagues constitute an online ‘work environment’ where the same standards of professionalism are expected as offline or on official work email systems.</p>	<p>The OPCC consistently applies a basic set of policies and practices to enhance workforce equality and diversity including reasonable adjustments, equal pay, flexible working, and family friendly policies, with a clear and transparent process around promotion opportunities. The PCC holds the Chief Constable to account to ensure that the same is in place in the force.</p> <p>Staff are engaged positively in employment and service transformation and in developing new roles and ways of working. Trade unions and partners are involved, where possible and appropriate.</p> <p>The PCC has held the Chief Constable to account locally for ensuring that appropriate policies are implemented within the force in terms of instant messaging.</p>	<p>The organisation has a comprehensive set of policies and procedures in place which are actively promoted to staff from all protected groups and used by managers to promote equality. Staff are involved in developing and monitoring these policies.</p> <p>Positive and tangible outcomes have been delivered because of the implementation of a wide range of policies and practices.</p> <p>The organisation has high satisfaction levels across all staff groups in respect of staff engagement.</p> <p>Feedback gathered through exit interviews is recorded systematically and acted on where necessary.</p>

<p>Diversity data on applicants for posts is collected, in line with GDPR considerations.</p>	<p>The OPCC conducts exit interviews to understand why people leave the organisation. The PCC has held the Chief Constable to account to ensure that exit interviews can be used in the force to understand staff and officers' reasons for leaving.</p> <p>Applicant diversity is actively monitored, whilst underrepresented groups are targeted in recruitment campaigns.</p>	
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Learning and Development		
Developing	Achieving	Advancing
<p>15.1 The OPCC carries out regular evaluations of the training and learning and development needs required to ensure the PCC, DPCC (if employed) and officers are equipped to understand their equality duties and take action to deliver equality outcomes.</p>	<p>15.2 The OPCC provides a range of accessible learning and development opportunities to support the PCC, DPCC (if employed), and staff in achieving equality objectives and outcomes.</p>	<p>15.3 The PCC understands the importance of equality when making decisions and in holding the Chief Constable to account. All OPCC staff are knowledgeable about the diverse needs of local communities within the force area and well-trained in key aspects of equality and diversity.</p>
Criteria		

<p>An assessment has been made as to what equality-related training, learning or development is required by OPCC staff.</p> <p>Any learning and development plan/strategy for staff which the OPCC may have developed takes account of equality issues. The PCC holds the Chief Constable to account for ensuring that the same is in place in the force.</p> <p>Workers are provided with training which addresses each of the three types of harassment: harassment related to a protected characteristic; sexual harassment; and less favourable treatment following sexual harassment. The PCC has held the Chief Constable to account to ensure that similar training is provided to officers and staff in the force.</p> <p>Induction training for new staff covers equality issues sufficiently, including the PCC and the OPCC's obligations in line with the Public Sector Equality Duty.</p> <p>Appraisal processes ensure staff and managers are aware of their equality-</p>	<p>Equality and diversity form a key part of the training and development for organisational leaders within the OPCC.</p> <p>The PCC holds the Chief Constable to account that equality and diversity forms a key part of the learning and development provided to police officers of all ranks.</p> <p>The PCC's equality objectives are reflected within professional development review processes for OPCC staff. Management and individual appraisals include specific equality objectives, where appropriate.</p> <p>The PCC has held the Chief Constable to account to ensure that line managers within the force have the necessary capabilities to handle discrimination and harassment grievances.</p> <p>OPCC staff are confident that they understand the needs of diverse communities within the force area.</p> <p>The PCC holds the Chief Constable to account regarding the importance of police recruits having the emotional</p>	<p>Managers and staff are accountable for ensuring equality outcomes. They can give examples of improved equality outcomes that they have contributed to. Good performance on equality is recognised in the appraisal process and more generally.</p> <p>Issues relating to protected characteristics and equality practice are challenged confidently and effectively by managers and staff.</p> <p>Feedback from members of the public from all communities is positive about the skills of staff in dealing with issues relating to equality.</p> <p>The Chief Constable can demonstrate to the PCC that powers are being used more proportionately as a result of improved training.</p>
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<p>related responsibilities and accountabilities.</p> <p>The PCC has engaged with the force to ensure that there is a structured process in place for regularly reviewing and monitoring body-worn video footage from Stop and Search and other Use of Force encounters, in order to drive officer improvement. Officers are held to account when behaviour falls below acceptable standards.</p>	<p>competencies and behaviours necessary to work with highly vulnerable groups.</p> <p>The PCC has challenged the force to carry out an audit of training provision regarding the use of police powers.</p>	
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Health and Wellbeing		
Developing	Achieving	Advancing
<p>16.1</p> <p>The OPCC has begun to consider how it can address key employee health and well-being issues. The OPCC monitors what the force is doing around health and well-being, with the PCC holding the Chief Constable to account in this area.</p>	<p>16.2</p> <p>The organisation promotes the health and well-being of staff in its workforce and other policies.</p>	<p>16.3</p> <p>There is a positive health and wellbeing culture throughout all levels and areas of the service.</p>
Criteria		
<p>The OPCC uses workforce data and other information from staff to determine what its health and wellbeing priorities are.</p>	<p>There is a comprehensive Health and Wellbeing Strategy that addresses a range of related issues.</p>	<p>The OPCC has adopted the Social Model of disability, whilst the PCC holds the Chief</p>

<p>The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met. Occupational health services are provided.</p> <p>The OPCC has a policy for Reasonable Adjustments for staff and managers are trained to implement it.</p> <p>The OPCC has started to address mental health issues in the workplace.</p> <p>The OPCC has in place an effective and well-communicated policy which aims to prevent harassment and victimisation. The PCC has held the Chief Constable to account to ensure that the same as in place in the force.</p> <p>Harassment policies recognise the different forms that harassment can take (e.g., sexual harassment, harassment related to protected characteristics). Anti-harassment policies are reviewed annually. The PCC has challenged the Chief Constable to ensure that the same happens within the force.</p>	<p>Improvements have been made to the working environment. Staff are engaged positively in employment and service transformation and in developing new roles and ways of working.</p> <p>Reasonable Adjustments are provided in a timely fashion consistently across the organisation.</p> <p>Human Resources takes an occupational health approach to identify and address absence trends.</p> <p>Managers have received training on mental health awareness and say they are equipped to address staff issues.</p> <p>Harassment and bullying incidents are monitored and analysed regularly. Appropriate action is taken to address the issues that have been identified. The PCC has challenged the Chief Constable to ensure that the same takes place within the force.</p> <p>The anti-harassment policy has been developed in consultation with a</p>	<p>Constable to account for ensuring that the same is done within the force.</p> <p>There have been significant positive outcomes at the OPCC in the health and wellbeing of all staff including those from underrepresented groups.</p> <p>There are high satisfaction levels within the working environment across all staff groups, particularly those from underrepresented groups.</p> <p>Harassment and bullying at work are dealt with effectively and staff say that they are treated with dignity and respect. The PCC is confident that the same can be said for the force.</p> <p>Centralised records of harassment complaints are kept, in a way compliant with the General Data Protection Regulation, allowing for trends to be analysed.</p>
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	<p>recognised trade union, or where there is not one, other workforce representatives. The PCC has challenged the Chief Constable to ensure that the same takes place in the force.</p> <p>Anti-harassment policies are published on an easily accessible part of the OPCC's external-facing website.</p>	
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Further Resources

The Equality and Human Rights Commission (EHRC) produces a range of guidance regarding the equality duty, including the general equality duty and specific duties:

- [Public Sector Equality Duty guidance](#)
- [Buying Better Outcomes procurement guide](#)
- [Artificial intelligence in public services](#)
- [EHRC Work in Wales](#)
- [EHRC Work in Scotland](#)