

Equality Framework for Police and Crime Commissioners and their Offices

Foreword

As Britain's regulator for equality and human rights, we welcome the introduction of the APCC's new Equality Framework. This is a positive step in advancing equality and promoting good relations between the police and communities at a time when it's needed more than ever.

The Framework has the potential to help Police and Crime Commissioners (PCCs), elected Mayors and their Deputies, and other police governance bodies to hold Chief Constables to account, and improve public trust that the police and wider criminal justice agencies are working to protect and serve all communities.

PCCs have access to rich data about the communities they are serving that allows them to identify areas of need. This might include, for example, data on which groups of people are more likely to be victims of domestic abuse. Knowing this detail will help PCCs to work with partners locally to make informed decisions about how to allocate funding towards local domestic abuse services, and specialist victim support services. An understanding of disproportionality in terms of the use of police powers such as stop and search and how this impacts on particular groups can also be used to build a picture of whether or not this power is being used in a fair and non-discriminatory way.

That's just a couple of examples of how the Public Sector Equality Duty can help PCCs to improve the effectiveness of policing and wider criminal justice services. I hope that this framework will also embed equality in everything the police does starting from the culture within the police itself. Ensuring a diverse and inclusive professional environment within

policing will help to recruit, retain, and advance the careers of people from underrepresented groups too.

Having a framework is a welcome and positive move, but to make a difference it must be adopted and taken forward with real commitment. I would urge every PCC to be ambitious with their equality objectives and set out action plans that can help meet their legal duties under equality law.



Jackie Killeen,
Director of Regulation,
Equality and Human Rights Commission



The Equality and Human Rights Commission is a statutory non-departmental public body, which safeguards and enforces the laws that protect people's rights to fairness, dignity, and respect. The Commission has legal powers under the Equality Act 2006 to challenge discrimination, promote equality of opportunity, and protect human rights, and is able to take legal action against those who abuse the rights of others.

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Introduction

Police and Crime Commissioners, Police Fire and Crime Commissioners, and Deputy Mayors for Policing and Crime (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.

The framework below is designed to assist PCCs in meeting both the duties that apply to them, and also 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 Business Plan 2020-22, the Framework aims to enable APCC members to “confidently apply and champion equality and diversity principles” locally.

The APCC hopes that PCCs and their offices will be able to use this toolkit 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. The Framework includes four sections:

- Understanding and working with your communities
- Leadership and Organisational Commitment
- Responsive Services
- Diverse and Engaged Workforce

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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 its progression against different priorities. 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 Excellent 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 a number of 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
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		

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March 2023 Update

Following discussion at a meeting of the APCC Race Disparity, Equality, and Human Rights Portfolio Group in November 2022, this framework has been 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 the Ministry of Justice Strategy on Supporting BAME Victims of Crime, and also the NPCC and College of Policing Police Race Action Plan.
- Reflect concerns relating to the use of Artificial Intelligence in policing. Artificial Intelligence is the science and practice of using algorithms to automate processes, analyse data and support decision-making or the delivery of services and information. It's deployment in policing is often allied to the use of new biometrics for identification such as face, iris and voice recognition.

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 being 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, and 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 partners actively.</p>	<p>1.3. A comprehensive set of information about local communities/protected characteristics needs and outcomes is 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>Relevant equality objectives have been set for the OPCC and the force.</p> <p>The OPCC has accessed the Youth Justice Board's Summary Disproportionality Tool via the Knowledge Hub administered by the APCC, in order to understand ethnic disparities in the Youth Justice System.</p> <p>The OPCC knows what information is already being collected – internally and by its</p>	<p>Quantitative and qualitative research methods are used by the OPCC to gather data and information.</p> <p>National and regional data is used and analysed.</p> <p>Data is easily accessed, shared, and used by staff across the OPCC.</p> <p>The OPCC is working with the force and other partners to address identified gaps in information. Data is disaggregated using the same or similar categories.</p>	<p>Changing needs are identified and prioritised across a wide range of services and outcomes by, 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 commissions, regarding groups within the force area with protected characteristics.</p> <p>The OPCC has accessed the Youth Justice Board's Summary Disproportionality Tool on the Knowledge Hub, is using the data to inform</p>

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<p>partners - including voluntary and community sector stakeholders.</p> <p>Some information and data have been gathered and published.</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 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>The OPCC has accessed the Youth Justice Board's Summary Disproportionality Tool on the Knowledge Hub, and is using the data to inform decision-making and priority-setting. This is reflected in public documents, e.g., the Police and Crime Plan.</p> <p>There are robust and effective protocols in place for sharing information between partners to ensure data protection.</p> <p>The PCC has challenged the force to build an evidence base on disparities impacting on Black communities locally.</p> <p>The PCC has challenged the force to carry out an audit of the use of powers that impact disproportionately on Black communities, e.g., section 60 under the Criminal Justice and Public Order Act. The PCC is confident that the force has developed an action plan to address disparities, and engaged with national bodies including the NPCC and the College of Policing for support.</p>	<p>decision-making and priority-setting, and has reflected in public documents, e.g. the Police and Crime Plan. There is evidence that disparities are being reduced through actions taken by the PCC.</p> <p>There is evidence of a continuous improvement of the quality of the data collected.</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>The PCC has challenged the force to carry out an audit of the use of powers that impact disproportionately on Black communities, e.g., authorisations of the use of section 60 under the Criminal Justice and Public Order Act. The PCC is confident that the force has developed an action plan to address disparities, and engaged with national bodies including the NPCC and the College of Policing for support. Disparity in the use of such powers has reduced.</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, in order 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 with regard to 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 with regard to police use of powers (e.g. Stop and Search) and police use of force (e.g. TASER use), particularly with regard to their use on people who are Black, Asian, and/or Minority Ethnic (BAME), and levels of community confidence.</p> <p>PCCs use data to hold Chief Constables to account.</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 in the area in the use of these powers.</p> <p>Data is used to inform the setting of relevant equality objectives, and these are regularly monitored.</p> <p>Data is used in decision-making, commissioning and to hold the Chief Constable to account.</p> <p>Information is disaggregated in a meaningful way, to identify and prioritise the basis of need, by relevant protected characteristic and other factors (such as deprivation or rurality), taking into account disproportionality.</p> <p>Information and data are used effectively as part of impact and risk assessments, giving due regard to the Public Sector Equality Duty.</p>	<p>The PCC uses data on use of force and Stop and Search to hold the Chief Constable to account, there is evidence that ethnic disparities in the use of police powers are decreasing.</p> <p>Data is being used to predict and measure demand for services</p> <p>Achievement of outcomes are measured and 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 objectives.</p>

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	In areas with smaller Black, Asian, and Minority Ethnic (BAME) communities, targeted qualitative work is carried out by force or OPCC to assess confidence levels.	
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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 with regard to 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. Communities from across the protected groups 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; the OPCC can evidence examples of these opportunities.</p> <p>Shared engagement structures/mechanisms are in development with partners, including</p>	<p>People with protected characteristics are encouraged and enabled to participate in decision making and scrutiny processes, such as community panels which scrutinise the force use of police powers (including Stop and Search), and use of force (e.g. Taser use).</p> <p>Policies, practices, and/or decision-making processes have changed where necessary as a result of engagement – with both communities</p>	<p>There are a range of innovative approaches to involving communities and arrangements are made to meet specific or individual needs.</p> <p>Vulnerable people/ communities are participating including the ‘hardest-to-reach’ in the community.</p> <p>There is evidence that mainstream engagement mechanisms are increasingly involving previously under-represented groups.</p>

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<p>commissioned services and third sector organisations.</p> <p>Participants in Community Scrutiny Panels understand how to activate the ‘community trigger’, in line with commitments that all forces signed up to within the Best Use of Stop and Search Scheme.</p> <p>A Community Scrutiny Panel is in place in the force area, which scrutinises police use of powers and force and chaired by an independent member of the public.</p> <p>Locally, Taser use - in particular its use against certain groups, including people from Black, Asian and minority ethnic backgrounds, people with mental health concerns and children – is scrutinised through analysis of Taser data, regular reviews of body worn video and dip-sampling.</p> <p>The OPCC engages with staff networks within the force that represent police staff and officers with protected characteristics (e.g. Black Police Associations, LGBT+ Networks, faith networks) in order to understand their perspectives and concerns.</p>	<p>and voluntary sector organisations - with a clear and demonstrable evidence basis.</p> <p>There is an increase in the engagement of underrepresented groups.</p> <p>There are processes and plans throughout the OPCC, with the force and with other partners to increase stakeholder and voluntary and community sector involvement in informing priorities.</p> <p>Engagement takes the form of dialogue: feedback is given and people in the community are able to challenge and have their views heard and where necessary acted on.</p> <p>The PCC ensures 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>The OPCC actively monitors which groups are engaging with current community engagement processes, understands which groups are</p>	<p>Staff and stakeholders are able to describe levels of influence within the community and changes made as a result.</p> <p>The PCC or senior leaders from the force are involved in the engagement and community processes, or are made aware of critical issues that arise.</p> <p>The OPCC and the force are viewed by groups with protected characteristics as being open to challenge and constructive criticism.</p> <p>The OPCC engages frequently with staff networks within the force that represent police staff and officers with protected characteristics (e.g. Black Police Associations, LGBT+ Networks, faith networks). Their perspectives and concerns feed into the PCC’s planning and scrutiny functions with regard to force workforce diversity.</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>Data on disproportionality in the use of police powers is published on the force/OPCC website, at least annually.</p>
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<p>Independent local ethics committees are in place to provide assurance to PCCs in terms of the force's local use of Artificial Intelligence.</p>	<p>underrepresented, and seeks to take remedial action to involve them in future engagement.</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 suffering from mental distress.</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 suffering from mental distress. Demonstrable progress has been achieved.</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 As per 3.1 above, Structures are in place within the OPCC and the force, and/or Community Safety Partnerships (CSP) 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 CJS amongst communities which have reported low confidence previously.</p>
Criteria		

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<p>There are joint partnerships responsible for monitoring community tensions and measuring community trust.</p> <p>Community Safety Partnerships actively foster community cohesiveness.</p> <p>OPCC leaflets/ posters/ communications/ events 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>Overview and Scrutiny functions are used to scrutinise and challenge the performance of the force on progressing the equality objectives set by the PCC in the Police and Crime Plan.</p> <p>Information about scrutiny functions, e.g., Community Scrutiny Panels (CSPs) is easily accessible to the public.</p>	<p>Information is available to show there has been an improvement in community confidence in the police force.</p> <p>The OPCC actively works with other organisations to improve performance on good relations between diverse communities.</p> <p>The PCC maintains a high profile on community relations, and engages with diverse communities frequently.</p> <p>The PCC plays a leading role in bringing the partners and the community together if there are serious incidents of hate crime, ensures 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>
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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/Mayoral role in policing and criminal justice services</p>	<p>5.2 Linked to 3.1, local people are encouraged to participate in community engagement activities;</p>	<p>5.3 There is an improvement in the participation rates of under-represented groups in OPCC and force community engagement processes.</p>

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<p>amongst all communities within the force area, including amongst people with protected characteristics.</p>	<p>particularly groups who are currently under-represented within engagement processes.</p> <p>The OPCC uses a range of different methods and is able to innovate and find new ways to make the public aware of the PCC role, and how they can 'have their say' in policing.</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>
<p>Criteria</p>		
<p>Information/data is gathered about people who engage with the PCC/their office, as appropriate.</p>	<p>Outreach work or public campaigning has been undertaken to increase levels of participation by under-represented groups in community engagement processes (e.g. Community Scrutiny Panels regarding the police use of power and force).</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	Achieving	Advancing
<p>6.1 The PCC has publicly committed to reducing inequality, fostering good relations, and challenging discrimination.</p>	<p>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, and meet their duties under the Equality Act.</p>	<p>6.3 PCCs have gained a reputation within the community and with all of its partners for championing equality, balancing competing interests and fostering good relations.</p>
Criteria		
<p>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.</p> <p>The PCC has publicly committed to improving equality in their area and tackling disparities in policing and criminal justice, including 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 and senior members of staff within the OPCC can demonstrate their commitment to equality in decision making and how this informs the way the organisation responds to challenges.</p> <p>Equality objectives are set and published for the force area, with the PCC and senior members of OPCC staff having ownership for the actions.</p> <p>Senior leaders understand the value and impact good communications can have and ensure that publications, websites and other communications channels reflect diverse communities and are accessible.</p> <p>The organisation promotes a positive</p>	<p>The OPCC is able to show that even when making difficult decisions, it continues to demonstrate a clearly articulated and meaningful commitment to equality.</p> <p>Staff, the community or the voluntary and community sector can offer good examples of how effective communication and engagement within the OPCC has enabled the better outcomes for communities in the area relating to equality.</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>

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<p>The Police and Crime Plan sets out clear priorities on tackling disparities in policing and crime outcomes, and achieving on the equality objectives set by the PCC.</p> <p>The PCC is working with the Chief Constable to develop a clear joint strategy on equality, diversity, and inclusion, building on the equality objectives that they have set locally.</p> <p>The PCC is aware of the NPCC and College of Policing Police Race Action Programme and has raised it with their Chief Constable.</p> <p>In terms of the use of Artificial Intelligence, the PCC has held the Chief Constable to account for ensuring that the force has fully 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>narrative around equality and good relations across the whole community.</p> <p>The PCC has published alongside the Chief Constable a clear joint strategy on equality, diversity, and inclusion -including a process of Equality Impact Assessment- building on the equality objectives that they have set locally.</p> <p>The PCC is aware of the NPCC and College of Policing Police Race Action Programme and raises it periodically with their 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 technology (rather than outsourcing this to the third-party technology provider).</p> <p>The PCC has also challenged the Chief Constable to ensure that the force's the internal lead on the Public Sector Equality Duty is aware of how the technology is being deployed, and is actively monitoring for any potential ramifications for the force's legal equality duties.</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, and there is evidence that this has driven improvements.</p> <p>The PCC is aware of the NPCC and College of Policing Police Race Action Programme, raises it periodically with their Chief Constable, and is confident that the force can demonstrate clear local progress on its aims.</p> <p>The PCC has discussed with the Chief Constable their engagement with the NPCC and the College of Policing on their ambition within the national Police Race Action Plan to develop a national approach for data ethics to ensure that digital policing is not biased.</p>
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Priorities and Partnership Working		
Developing	Achieving	Advancing

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<p>7.1 Partnership working arrangements are being reviewed with service providers, the voluntary and community sector and the wider community to ensure that perspectives from all communities can be fed into OPCC planning.</p>	<p>7.2 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.</p>	<p>7.3 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.</p>
<p>Criteria</p>		
<p>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.</p> <p>Equality objectives are reflected in local strategic planning, e.g. in the Police and Crime Plan.</p> <p>The PCC has prompted their commissioned victims services to partner with local partners including the NHS and local authorities with regard to supporting victims from ethnic minority groups.</p>	<p>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.</p> <p>There is a clear shared vision for the area. This is captured within the OPCC's equality objectives, the Police and Crime Plan, and commissioning strategies.</p> <p>The organisation and its partners monitor, review, and evaluate performance against equality priorities in policing and criminal justice.</p> <p>The PCC is ensuring that their commissioned victims services are actively collaborating with local partners including the NHS and local authorities with regard to supporting victims from ethnic minority groups.</p>	<p>Staff, the community or the voluntary and community sector give good examples of improved outcomes/ reduced inequality/ improvements in disparities in policing and criminal justice.</p> <p>The community or the voluntary and community sector are involved in strategic planning on a co-design basis.</p> <p>Local commissioned victims services are able to demonstrate how collaborating with NHS, local authorities, and other bodies locally has improved the service that they deliver to victims from ethnic minority backgrounds.</p>

Assessing Equality Impact in Policy and Decision Making

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<p>8.1 Due regard is taken with regard to 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.</p>	<p>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.</p>	<p>8.3 The OPCC can demonstrate that improvements in equality outcomes are being delivered as a result of effective equality analysis and impact assessment, and that negative impacts have been mitigated.</p>
<p>Criteria</p>		
<p>The OPCC has an agreed approach to conducting equality analysis/ impact assessment of policy and service decisions.</p> <p>OPCC staff are aware of the Public Sector Equality Duty and how it applies to their work.</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, making reference to the PCC's equality objectives.</p> <p>There is evidence that the PCC routinely takes account of equality analysis/ impact assessment when making decisions.</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>

<p>Equality Objectives and Annual Reporting</p>		
<p>Developing</p>	<p>Achieving</p>	<p>Advancing</p>
<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.</p>	<p>9.3 The organisation can demonstrate a clear link between meeting their equality objectives, positive outcomes for its communities (e.g., increased trust in the police amongst groups that</p>

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	Outcomes are measured and monitored regularly.	may previously have had lower levels of confidence).
Criteria		
<p>The specific duty with the Equality Act to publish equality objectives has been met, e.g., the setting of equality objectives and the publication of relevant information.</p> <p>Objectives are underpinned by robust equality analysis.</p> <p>Equality objectives 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>There is evidence of a link between equality objectives, business planning and performance management.</p> <p>OPCC Staff own specific activities in order 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>There is evidence that equality objectives have led to improved outcomes, including for people with protected characteristics.</p> <p>Actions to achieve priority outcomes are reviewed and regularly updated. Steps are taken if deficiencies are identified.</p> <p>Stakeholders and staff are involved in the monitoring of objectives.</p> <p>An annual Equality report is published by the OPCC, detailing progress on equality objectives</p>

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 and 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		
There is an appropriate and accountable individual at a relevant level of seniority within		The OPCC assesses its performance and outcomes, and those of the force and

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<p>the OPCC who holds responsibility for the equality agenda.</p> <p>There are resources for supporting equality work.</p>	<p>Progress and responses are reported regularly to the PCC and/or the OPCC Chief Executive.</p> <p>The PCC has challenged the Chief Constable to carry out a self-assessment as to whether the force is complying with College of Policing Authorised Professional Practice on the use of Stop and Search. The PCC has encouraged the Chief Constable to provide any feedback on its suitability to the College.</p>	<p>commissioned victims services, against other OPCCs and forces.</p>
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Responsive Services		
Commissioning Services		
Developing	Achieving	Advancing
<p>11.1 The OPCC ensures that procurement and commissioning processes and practice – 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>Guidance is available for suppliers on the equality requirements for the procurement and commissioning process.</p> <p>Equality Impact Assessments form a key part of the ‘due diligence’ conducted with regard to any prospective suppliers. The PCC holds the Chief Constable to account to ensure this is also the case within the force.</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 particularly affects 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>There is evidence that performance on equality clauses in contracts are being monitored using quantitative and qualitative analysis. 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 commitment to equality, and are engaged with a wide range of communities to understand varying needs.</p>

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<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 minority demographics of their local communities, working with local experts to gain insight from their experience and knowledge.</p> <p>The PCC has undertaken a needs assessment to ensure they are commissioning services that meet the needs of all their communities, including ethnic minority communities, as well as other groups who share protected characteristics.</p> <p>The OPCC is considering how it can best capture the needs of victims from ethnic minority communities in every stage of their planning and commissioning of victims services.</p> <p>The PCC is considering how to promote victims services in their areas to ensure that ethnic minority victims are aware of the services available to them.</p> <p>The PCC has raised with the victims services that it commissions the need to conduct Equality Impact Assessments.</p>	<p>The PCC is providing services that proportionately reflect the ethnic demographics of their local communities.</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 services available to them.</p> <p>The OPCC has reviewed messaging used to promote victims services, to ensure it is appropriate and attractive to a diverse audience.</p> <p>The PCC is satisfied that the victims services it commissions are conducting robust Equality Impact Assessments, and that these are used to drive service improvements.</p>	<p>The OPCC is able to demonstrate increased confidence amongst ethnic minority to 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, taking into account intersects with other protected characteristics. The OPCC is able to demonstrate increased confidence amongst ethnic minority to victims to access the victims services that it commissions.</p> <p>The PCC is satisfied that the force is able to demonstrate improvements in the way that it responds to Black victims of crime, Black missing people, and Black people who are suffering from mental distress.</p>
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Service Delivery

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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 – e.g., reporting of crime, accessing victims services - is representative of the wider community.</p>	<p>12.3 The organisation has systems in place to use monitoring data and citizen 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 organisation is able to analyse and measure whether all sections of the community are able to access police services, and other commissioned services.</p> <p>Commissioned services 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 organisation 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 analyses/ equality impacts assessments.</p> <p>Human Rights issues are understood and considered when setting the strategy for the police force and commissioning services.</p> <p>Local demographic data is used to ensure that victims services are appropriately representative of, and tailored to, the clients that they serve. Where possible, specific services are commissioned to support ethnic minority victims.</p>	<p>Services are co-produced with service users wherever possible and service users are able to influence changes</p> <p>There is evidence of how levels of user satisfaction with services have improved over time.</p> <p>Take up of services is representative of the community in proportions that would be expected.</p> <p>There are examples of how different users' experiences are analysed and acted upon.</p> <p>The OPCC has taken steps to safeguard the human rights of individuals where these have been threatened</p> <p>Victims services are able to provide detail on their service users, and evidence that they are providing a service that is compliant with</p>

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<p>Complaints about the force made to the OPCC are disaggregated by protected characteristics.</p> <p>Appropriate mechanisms are in place to ensure that Human Rights considerations are identified when setting the strategy for the police force.</p>	<p>Victims services are able to demonstrate that they are engaging with a wide range of voices from local ethnic minority communities to better understand need, including those of children and young people.</p>	<p>equality and human rights legislation, and that specifically meets the needs of ethnic minority communities.</p>
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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 a clear understanding of demographics within the force area., and the police workforce.</p> <p>It 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 create a more diverse police workforce. These are reflected in recruitment policies and procedures; the commitments are reflected 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. The Chief Constable is held to account for encouraging progression within the force of people with protected characteristics.</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 disciplinary as well as exit from the service.</p> <p>The PCC is holding the Chief Constable to account to ensure that staff networks are informing the drive to make the force more representative of the communities it serves.</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.</p> <p>There are reasonable explanations for gaps (e.g. the community profile is constantly changing or largely retired population) and what the organisation is doing about it.</p> <p>Good use is made of flexible working arrangements (where possible) and career</p>

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<p>Recruitment and selection is 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>Specific and measurable employment targets have been set to improve workforce diversity in the OPCC. The PCC has set targets for the force also.</p> <p>Selection panels – especially those for recruitment of senior positions- are trained in unconscious bias.</p> <p>The PCC has held the Chief Constable to account for ensuring that within the force there is a clear, transparent process which governs promotion opportunities.</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), and used the findings to drive improvements in terms of cultural competency and participants’ retention and performance.</p>	<p>pathway initiatives to address potential barriers and under representation.</p> <p>Disciplinary and grievance data is similar across all 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), and used the findings to drive improvements in terms of cultural competency and participants’ retention and performance. The force is able to demonstrate improvements.</p>
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Inclusive Strategies and Policies		
Developing	Achieving	Advancing
<p>14.1 Any Human Resources strategy which the OPCC uses includes equality considerations and objectives. The PCC holds the Chief Constable to</p>	<p>14.2 The equality objectives contained within workforce strategies for both the OPCC and the force are implemented and monitored; the PCC</p>	<p>14.3 Prioritised equality outcomes for the OPCC and the force are being achieved.</p>

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<p>account for ensuring the same applies to the force.</p>	<p>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 equality legislation and employment codes of practice</p> <p>Targets and objectives are based on internal monitoring, staff consultation and the assessment of the demographics of the local area and labour market.</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 reviewed.</p> <p>The OPCC is using its workforce data to develop training and development strategies that can support a wider equalities agenda for employees.</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 organisation 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.</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 OPCC has a clear policy on the use of social media and instant messaging (IM) applications in a professional context, which is clearly understood by all staff: staff know what to do when problems arise, and problems are dealt with effectively and sensitively. The PCC has held the Chief Constable to account locally for ensuring that similar policies are implemented within the force.</p> <p>The OPCC conducts exit interviews to understand why people leave the organisation.</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.</p> <p>Staff are involved in developing and monitoring these policies. Positive and tangible outcomes have been delivered as a result 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>The OPCC has a clear and effective policy on the use of social media and instant messaging (IM) applications in a professional context, which is clearly understood by all staff: A similar policy has been implemented within the force, with problems being dealt with effectively and sensitively.</p>

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Diversity data on applicants for posts is collected, in line with GDPR considerations.	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.	Feedback gathered through exit interviews is recorded systematically and acted on where necessary.
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Learning and Development		
Developing	Achieving	Advancing
<p>15.1</p> <p>The OPCC carries out regular assessments 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</p> <p>The OPCC provides a range of accessible learning and development opportunities to support the PCC, DPCC (if employed), and officers in achieving equality objectives and outcomes.</p>	<p>15.3</p> <p>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>Appropriate behavioural competencies have been identified for the workforce.</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>Equality and diversity forms part of the training and development for key decision makers within the OPCC.</p> <p>The PCC's equality objectives are reflected within professional development review processes for OPCC staff.</p> <p>There is evidence that equality issues are mainstreamed into all training, particularly in regard to training on liaising with the public.</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, to ensure that equality and diversity is embedded throughout the force's leadership.</p> <p>Managers and staff are accountable for ensuring equality outcomes. They can give examples of improved equality outcomes they have contributed to.</p>

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<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-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. Officers are held to account when behaviour falls below acceptable standards.</p> <p>The PCC has challenged the force to carry out an audit of training provision with regard to the use of police powers.</p>	<p>Employees are confident that they understand the needs of diverse communities within the force area. They are made aware of equality objectives or any changes or improvements.</p> <p>Management and individual appraisals include specific equality objectives.</p> <p>Training courses and development interventions are meeting the needs of different groups, and are making a difference in terms of helping people from under-represented groups progress within the organisation.</p> <p>The PCC holds the Chief Constable to account regarding the importance of police recruits having the emotional 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 with regard to the use of police powers, which the force has conducted, and is making improvements in line with the audit's results.</p> <p>The PCC has encouraged the force to review local products and existing initiatives with regard to developing officers' and staff members' understanding and the relationship between policing and Black communities.</p>	<p>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>Staff can answer questions about the PCC's equality objectives, and how they contribute towards the objectives in their roles.</p> <p>Feedback from members of the public is positive about the skills of staff in dealing with issues relating to equality.</p> <p>Training and development strategies are proven to be making a significant difference to the wider equality agenda for employees and for workforce diversity.</p> <p>The force is able to demonstrate that powers are being used more proportionately as a result of improved training.</p>
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Health and Wellbeing		
Developing	Achieving	Advancing
<p>16.1 The OPCC has begun to consider how it can address the key employee health and wellbeing 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 The organisation promotes the health and well-being of staff in its workforce and other policies.</p>	<p>16.3 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>The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met.</p> <p>The OPCC has a policy for Reasonable Adjustments for staff and Members and managers are trained to implement it.</p> <p>Occupational health services are provided.</p> <p>The OPCC has started to address mental health issues in the workplace.</p>	<p>There is a coherent Health and Wellbeing Strategy that addresses a range of related issues.</p> <p>Improvements have been made to the working environment.</p> <p>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>The OPCC has adopted the Social Model of disability; whilst the PCC holds the force to account for ensuring that they do the same.</p> <p>There have been significant outcomes in the health and wellbeing of all staff including those with protected characteristics.</p> <p>There are high satisfaction levels with the working environment across all staff groups particularly those with protected characteristics.</p> <p>The OPCC has high satisfaction levels across all staff groups in respect of staff engagement.</p>

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<p>Policies and systems are in place to identify, prevent and deal effectively with harassment and bullying at work.</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.</p>	<p>Harassment and bullying at work is dealt with effectively and staff say that they are treated with dignity and respect.</p>
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Further resources

Below are some resources which PCCs and their offices may find useful in terms of determining their equality objectives locally:

The APCC produces a Race Disparity Toolkit, which features a number of good practice examples where PCCs are making a difference to tackle race disparity locally:

<https://www.apccs.police.uk/media/6381/3-apcc-race-disparity-toolkit-2nd-edition-may-2021.pdf>

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

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

The EHRC produces guidance specifically on mainstreaming equality considerations in procurement:

<https://www.equalityhumanrights.com/en/publication-download/buying-better-outcomes-mainstreaming-equality-considerations-procurement-guide>

The EHRC have also produced guidance on the use of Artificial Intelligence in policing:

<https://www.equalityhumanrights.com/en/advice-and-guidance/artificial-intelligence-public-services>

Information about the EHRC in Wales and Scotland can be found at the following links:

<https://www.equalityhumanrights.com/en/commission-wales>

<https://www.equalityhumanrights.com/en/commission-scotland>

The NPCC and College of Policing Police Race Action Plan can be read at the following link:

<https://assets.college.police.uk/s3fs-public/Police-Race-Action-Plan.pdf>