



House of Commons
Home Affairs Committee

**Police diversity:
Government Response
to the Committee's
First Report of Session
2016–17**

**Second Special Report of Session
2016–17**

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Home Affairs Committee

The Home Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Home Office and its associated public bodies.

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Publication

Committee reports are published on the Committee's website at www.parliament.uk/homeaffairscom and in print by Order of the House.

Evidence relating to this report is published on the [inquiry publications page](#) of the Committee's website.

Committee staff

The current staff of the Committee are Carol Oxborough (Clerk), Phil Jones (Second Clerk), Harriet Deane (Committee Specialist), Adrian Hitchins (Committee Specialist), Kunal Mundul (Committee Specialist), Andy Boyd (Senior Committee Assistant), Mandy Sullivan (Committee Assistant) and Jessica Bridges-Palmer (Committee Media Officer).

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Second Special Report

On 21 May 2016 the Home Affairs Committee published its First Report of Session 2016–17, *Police Diversity* (HC 27). The Government's response to the Report was received on 20 July 2016, and is published as an Appendix to this Special Report.

In the Appendix, the Committee's recommendations (or excerpts from them) to which the Home Office has provided a response are shown as bulleted *italicised* paragraphs. The Home Office has also added its own *emphasis* to some of the recommendations (or excerpts).

Letter to the Chairman of the Committee from Rt Hon Amber Rudd MP, Home Secretary, 20 July 2016

I am writing to respond to your recent report on police diversity.

The Government is clear: equality and diversity are a fundamental part of the British model of policing by consent. We must retain this model of policing. That is why a representative workforce is such a serious issue.

We have reformed policing to ensure that there is a sector-led approach to making improvements, including in the area of recruitment and representation. Central to our reforms was the establishment of the College of Policing as the professional body for policing, charged to set standards in all areas of police practice. The College continues to work with forces to make their activity on black and minority ethnic officer recruitment, retention and progression as effective as possible, and to identify and share best practice.

Though it is not for the Home Office to intervene in operational matters, we continue to challenge the College, forces and others on the pace and ambition of their plans. There is a wide array of work underway, across policing organisations, under the sector leadership of the College.

The police have made real improvements in diversity – the proportion of women and black and minority ethnic (BME) officers is greater than ever before – but the Government is clear that there is more for forces to do. I am therefore grateful to the Home Affairs Select Committee for its report, and I enclose the Government's response.

Appendix: Government Response

Overview

The Government is firm in its view: increasing diversity in our police forces is not an optional extra. It goes right to the heart of this country's historic principle of policing by consent. We must ensure that the public have trust and confidence in the police, and that the police reflect the communities they serve.

The Government has reformed policing to ensure that there is a sector-led approach to making improvements, including in the area of recruitment and representation. Central to these reforms was the establishment of the College of Policing as the professional body for policing, charged to set standards in all areas of police practice.

The College is heading a programme of work underway across policing, to address the recruitment, retention and progression of officers from currently under-represented groups. This includes sharing good practice and knowledge across forces. The College is working with forces to encourage greater consistency and dissemination of knowledge and will continue with this work.

The officer workforce is more representative in terms of gender and ethnicity than it has ever been. However the Government has been very clear that there is more for forces to do. This not just because more diverse police forces mean we can make much better use of the talents and skills of people of all backgrounds and groups including black and minority ethnic (BME) individuals, disabled officers, officers who are Lesbian, Gay, Bisexual and Transgender (LGBT) and officers from all faiths. It is also because the police need to understand all communities if they are to tackle crimes that affect them. More than ever, diversity is an important part of operational effectiveness.

The Committee's report is a welcome contribution to this debate, which clearly builds on work on diversity in policing that has been spearheaded by this Government. The report's general themes and specific recommendations are addressed below.

Government Action

- Whilst there has been a steady increase in the overall proportion of officers and staff who are of a BME background, progress is painfully slow; there is wide variation between forces; and increased numbers of BME police officers remain overwhelmingly in the most junior ranks. Even allowing for appropriate career progression, the number of BME officers above the rank of Inspector is very disappointing. We find this unacceptable. We believe that it is time for concerted action, prioritised across all forces, policing bodies and Government.*

The Government has made a clear manifesto commitment to improve the diversity of police recruitment, especially of black and minority ethnic (BME) officers. The Government's BME 2020 programme is further evidence of this commitment.

Equality and diversity are a fundamental part of the British model of policing by consent: that is why a representative workforce is vital. As well as the programme of reform, including the establishment of the College of Policing as the professional body for all in

policing, the Government has highlighted this important issue by shining a light on the makeup of the police workforce. This includes publishing accessible workforce data on police.uk so that for the first time the public can easily compare how representative their force is against the local population in terms of female officers, and officers from black and minority ethnic backgrounds, making police performance more transparent to the taxpayers and citizens that police forces serve. This increased transparency allows the public to better hold their police and crime commissioner (PCC) and chief constable to account.

The Government wants to see police ranks opened up with flexible entry and exit paths to encourage diversity of experience and backgrounds amongst police leaders and develop a culture of challenge, particularly in the senior ranks.

Innovative schemes such as Direct Entry, Fast Track and Police Now are making the police workforce more diverse than ever before, showing that we can attract the brightest and best into policing, whilst introducing new perspectives into policing some of the country's most challenging neighbourhoods. Police Now – a flagship Metropolitan Police scheme aimed at attracting top university graduates, which is supported by Home Office funding – has become an independent organisation and is currently recruiting for placements in seven forces.

Sector Leadership

- *We have observed the progress on gender diversity within the police service and we are pleased to note that there is now a higher proportion of female representation in the most senior policing posts. The number of BME officers in police forces is increasing to some extent but this is largely limited to junior roles [...] People of a BME background wishing to develop their careers within the police service lack role models; encounter barriers when trying to access the training necessary for their career development; and face selection panels which are almost always lacking in diversity.*
- *The effective implementation of schemes to support the career development of BME officers appears to be subject to the discretion and commitment of individual forces and Chief Officers and is therefore too inconsistent and poorly monitored to be effective. **The College of Policing should provide further, stronger leadership on this.***

The Government has reformed policing and is clear that local police leaders and their representatives in the College of Policing and National Police Chiefs' Council (NPCC) are best placed to drive improvements across policing. In addition to a specific workforce lead within the College, the NPCC has a new equality diversity and human rights lead who works closely with the College. Within the governance of the College of Policing, work to support forces with diversity and inclusion sits within the faculty of Professional Development and Integrity. College activity on diversity and inclusion, however, is not limited to one area of police business. The Code of Ethics, for example, makes a clear statement about diversity and inclusion and applies across the whole of policing.

The College is halfway through a major programme of work called BME Progression 2018 in which all forces are participating. As part of this, each force has their own action plan to address the recruitment, retention and progression of officers from BME and other under-represented groups in policing. The College is committed to driving improvements

in diversity. The College's Chief Executive, Alex Marshall, wrote to forces earlier this year highlighting the positive action advice and good practice published by the College, and encouraging more diverse recruitment as part of any forthcoming recruitment decisions. The College has taken a number of concrete measures to bolster activity in forces. It has: published advice on the pro-active use of lawful positive action; published case studies from nine forces showing what can be achieved using positive action; delivered fast track positive action workshops to over 500 officers from under-represented groups; consulted forces on a review of initial police recruitment with recommendations designed to ensure that forces can attract a diverse workforce with the right skills to meet modern policing challenges in the future; disseminated research findings on Unconscious Bias through a conference; delivered a Stonewall programme for LGBT officers and staff; assessed diversity action plans from all forces outside the MPS; and begun to pilot a reverse mentoring programme with chief officers in six forces.

As well as valuing and developing existing police leaders, it is essential to go further and faster in encouraging more people from a range of backgrounds into the police where they can bring a fresh perspective and new ideas. The College is supporting these ambitions through the implementation of its Leadership Review. This includes recommendations that will support sustainable improvements to representation, for example by standardising promotion processes to all ranks, introducing more flexible careers and national advertising of roles.

Through the College of Policing Leadership Review it was evident that there is a significant lack of knowledge about the variety of roles on offer in policing. The recommendations therefore also include work to help individuals from outside policing to learn more about uniformed and non-uniformed careers, and the different entry routes into policing. This work also provides an opportunity to understand the barriers to attracting candidates, to incorporate positive action, introduce the best recruitment practices, and to influence longer term cultural change.

In addition the College of Policing has also worked extensively with HMIC, NPCC and forces to develop a set of Leadership Guiding Principles which include valuing difference and inclusion. These guiding principles form part of force inspections and are being incorporated into the new model of leadership and management development which is being developed with forces.

- *There is considerable variation in the achievements and the ambitions of police forces in England and Wales in increasing BME representation, and there is no mechanism for holding the worst performers to account. It is apparent to us that the current structures provide no clear leadership for increasing diversity, and allow this lack of accountability to persist.*
- ***Police and Crime Commissioners are the statutory mechanism for holding police chiefs to account on diversity and should take a much more active role on BME representation in their forces during their second terms in office.***
- ***Each police force should [...] appoint a workforce diversity lead. This person should usually be at Deputy Chief constable or equivalent rank.***
- ***We also recommend that the Home Office appoint a specific diversity lead for the police service (a "Police Diversity Champion"), with the authority to hold all police***

forces to account for achieving proper community representation throughout the ranks, including at the most senior levels, and in specialist roles, by collecting and publishing data, promulgating best practice, and providing practical advice. This appointment should be made by the end of the 2016–17 parliamentary session in May 2017.

No force is representative of its local population in terms of its proportion of BME officers. The Government is clear that each force should be striving to be more representative of the communities it serves.

The Government welcomes the vocal lead given by the Commissioner of Police of the Metropolis and other prominent leaders within policing. Some forces have already chosen to put in place senior champions for diversity such as Chief Superintendent Victor Olisa in the MPS. However, while the Government would expect senior commitment in all forces it is for local leaders to decide how they will deliver improvements.

PCCs have been instrumental in driving improvements in some areas but, given their pivotal role between the public and the police, there is clear value in greater emphasis being placed on this agenda by PCCs. The Government looks forward to working with the Association of Police and Crime Commissioners and individual PCCs once governance arrangements for the new cohort elected in 2016 have been established.

The Government also urges PCCs to consider the opportunities provided through the police transformation fund, which clearly sets out that it will support work to improve the diversity of policing and create a more professional and flexible workforce with the right skills. The College of Policing is working with stakeholders to explore appropriate submissions to this fund.

Specific Recommendations

- *A number of practical steps could be taken now to improve retention and progression of BME police officers, including to the most senior ranks. These include:*
- ***Compulsory training on diversity issues for selection and promotion panel members, including those for specialist posts.***

Recruitment to the police is managed locally within a national application, assessment and selection framework, in line with national guidance maintained by the College of Policing. The College of Policing has consulted forces on its review of initial police recruitment. The review has been carried out to ensure that police recruitment in the future is able to attract, recruit and retain the brightest and best officers from all groups in society. Recommendation 5: 'Enhancing Applicant Experience' provides an opportunity to improve processes and behaviours to present a more diverse and welcoming face to candidates.

Under its remit for sharing what works in policing the College has published case studies from forces which demonstrate effective practice for selection. For example, as part of a requirement for greater diversity West Midlands Police describe the use of a cohort of community partners as panel members at the final interview stage so that local communities were better represented. It is right that more forces should be taking opportunities to reduce the potential for unconscious bias during selection. Forces should

be following the example of the most pioneering forces and utilising all the available tools to ensure that they improve the recruitment, retention and progression of officers from under-represented groups.

The College of Policing provides equality and diversity guidance to support all forces to improve their recruitment packages. It also incorporates equality and diversity into all its leadership development programmes.

- ***Instituting coaching and mentoring for BME officers***

The College of Policing carried out the first survey of all BME officers nationally in 2014 which provided the evidence that BME officers would welcome more opportunities to benefit from mentoring. Subsequently, the College has implemented positive action workshops including 'Realising Potential' to support BME officers considering the new Fast Track to Inspector scheme. The 2014 round of Realising Potential workshops attracted 240 officers across the country and the internal Fast Track programme subsequently selected 20% (12 out of 61) of its cohort from BME groups. This is much more representative than the current Inspector rank which is 4% BME. This successful programme was re-run in October 2015 and broadened to other under-represented groups (i.e. female, LGBT, disability).

The College has recognised that to date there has been an emphasis on senior level development. In response, a College-led pilot action learning set is now underway in Merseyside and Greater Manchester police to support constables and sergeant ranks. The 'PEDALS' project which includes the creation of targeted personal and professional development plans for BME officers is currently being evaluated and subject to findings will be available for roll out in more forces in the future.

The College has also launched a Reverse Mentoring pilot in six forces (Gloucestershire, Greater Manchester, Staffordshire, Sussex, Wiltshire and West Midlands) to generate insight for chief officers into the challenges faced by officers from under-represented groups.

The College recognises that there is more to do and has undertaken a review of its work and responsibilities regarding equality and diversity, and will shortly be publishing its draft Valuing Difference and Inclusion Strategy for stakeholder feedback. This strategy was developed through a range of interventions including stakeholder engagement, diversity and equality related research and a forward looking perspective regarding the College's responsibilities under the themes of Knowledge, Education and Standards.

- ***Ensuring that units which deal with complaints from officers on personnel matters receive dedicated training on diversity issues.***

The College's role is to set professional standards for policing and to help police officers and staff meet those standards throughout their careers. As part of this remit it is responsible for accrediting training providers and setting learning and development outcomes. It is for PCCs and chief constables to work with their force to decide what training is required locally.

HMIC's PEEL legitimacy inspection, published in February 2016, makes clear recommendations to address concerns about fairness within discipline and complaints

systems. The report recommends that chief constables should conduct a review of their complaints and misconduct arrangements and, if there is evidence of bias, take action to remove it. HMIC also recommends that the College of Policing and National Police Chiefs' Council should agree national standards for recording and publishing complaints and misconduct data which will assist forces to determine whether bias exists for women and BME individuals.

It is now for PCCs and chief constables to decide how to take this forward in their force areas, along with the College of Policing and the NPCC.

- ***These four steps towards greater diversity should then be added as benchmarks for the performance measures against which every police force is assessed***

In 2010 the Government abolished Home Office performance targets helping to reduce bureaucracy, increase officer discretion and help to make the police more professional, more accountable and more transparent.

Police forces are operationally independent and accountable to local communities through democratically elected PCCs. It is for chief constables and PCCs, as operational leaders and elected local representatives, to decide how best to deploy resources to best manage crime and local priorities. HMIC is charged in statute with inspecting the efficiency and effectiveness of the police service in England and Wales. The purpose of the Inspectorate is to ensure standards are achieved, good practice is spread, performance is improved and the public are engaged and assured.

- ***A BME senior leaders' forum, similar to the Association of Senior Women in Policing, should also be established, to provide support and guidance to BME officers seeking promotion***

Policing leaders have a responsibility to work together on behalf of policing to ensure that officers have the right opportunities to progress their careers. Alongside this, staff support associations provide support to individual officers.

Whilst in principle this is an appealing idea, we would only wish to see it pursued if there was a clear sector desire for such a network, led by the College of Policing. It should be noted that a wide range of diversity staff and police support associations already exist and it would be important not to duplicate existing effort. It is for forces, NPCC and the College of Policing to work together (each fulfilling their appropriate roles) to progress equality and diversity within policing.

Positive Action

- ***We fully support the Home Secretary's ambition of a police service which is representative of the communities it serves [...] It may therefore be necessary for the police service to take further positive action, if the other measures which we propose in this report do not bear fruit sufficiently quickly.***

The Equality Act 2010 includes positive action provisions to enable employers to address identified under-representation of protected groups in the workplace, as is the case for BME officers in the police.

The Government has been clear that forces should be doing all they can under the positive action provisions of the Equality Act 2010. The Government agrees with HASC that the Metropolitan Police's cultural competence and language requirement are examples that should be applauded, and provide an example of pioneering activity to other forces. With the support of the College, forces have each developed a diversity action plan. The College of Policing has published guidance to encourage the use of lawful positive action and we agree that forces should be taking every opportunity to use the provisions in a way that is appropriate and lawful given local circumstances.

The Government remains clear that there is no need for positive discrimination to increase the numbers of BME officers in the police. Forces are making progress and to introduce such action would not only erode the credibility and confidence of individual officers, but would undermine the public's expectation that progression in the police is based on merit alone.

The Government believes that further scope exists within existing positive action provisions and there is some way to go before forces could say that all options have been exhausted.

- *Positive action measures taken by individual police forces, including the Metropolitan Police, have led to some successes, and we are particularly encouraged to hear that the Met uses positive action to support internal promotion processes at all ranks. **We reiterate our predecessors' recommendation that the importance of cultural intelligence, and abilities such as language skills relevant to the local policing area, should be assessed by each force and recognised in recruitment planning.***

As the Committee has acknowledged some forces are already applying bold measures and, as it heard from witness Robin Wilkinson on behalf of the MPS, the proportion of BME recruits in London has risen from 16% to 27% since the introduction of its London Residency criteria, second language criteria and other positive action initiatives that are underway. This shows what can be done when a force makes a clear commitment to improve in this vital area of policing.