



SCOTTISH POLICE
AUTHORITY
ÙGH DARRAS POILIS NA H-ALBA

Policing Issues Advisors Analysis



- Our Advisor Analysis highlights and draws key insights from a range of relevant publications. These insights and subsequent commentary have been developed to provide a national context to key issues and support oversight.
- The theme covered in this document is:
 - **Equality, Diversity and Inclusion:** The Independent Scrutiny and Oversight Board publishes its first annual report, which includes feedback on the Police Race Action Plan for England and Wales.
 - Please contact SPAStrategyandPerformance@spa.police.uk with any specific questions or feedback on topics you would like to be included in future editions.

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Equality, Diversity and Inclusion Thematic

Independent Scrutiny and Oversight Board Annual Report 2023

ISOB, 8th August 2023: Link [here](#)

Context

- This is the first annual report from the Independent Scrutiny and Oversight Board (ISOB) with feedback on the [Police Race Action Plan](#) for England and Wales.
- The [ISOB](#) (comprised of the [Chair](#) and [five board members](#)) was created to provide overview and external scrutiny of the Police Race Action Plan. A reiteration of the Police Race Action Plan will be produced in the next few months, and this report contains recommendations for this new iteration.
- In the Scottish context, in [November 2020](#) Dame Angiolini published the independent review into complaints handling, investigations and misconduct issues in policing which included findings relating to race and discrimination and recommendations relating to inclusion, diversity and discrimination. In response to Recommendation 18, Police Scotland established the Equality, Diversity, Inclusion and Human Rights Independent Review Group (EDIHR IRG) in 2021.
- Police Scotland presented the [Policing Together: Equality, Diversity and Inclusion Strategy 2022-26](#) to the Authority in [September 2022](#) which contains a number of commitments that relate to race equality in relation to policing and workforce.
- In April 2021 the Authority and Police Scotland published the [Joint Equality Outcomes for Policing 2021](#) with outcomes relating to both internal workforce matters and external societal issues.
- The Scottish [Race Equality Framework 2016-2030](#) contains various goals for the criminal justice sector in relation to race, underpinned by a range of workstreams. In June 2023 Scottish Government published a [progress review](#) on anti-racism in Scotland.

Summary/Findings

- Jointly owned by the College of Policing and NPCC, there are four main workstreams within the Race Action Plan supported by two enabling workstreams (Performance and Data, and Evidence and Evaluation):
 - Internal culture and inclusivity
 - Use of powers
 - Community engagement
 - Protection from victimisation

Equality, Diversity and Inclusion Thematic (continued)

Summary/Findings (continued)

- A Programme Board meets every two months to review activity and oversee progress, reporting to the Independent Scrutiny and Oversight Board. As at July 2023 there are 25 ice-breaker forces who have either already shown examples of good practice or are willing to pilot activity.
 - The report contains **seven key recommendations**:
- 1. Restructure of the Race Action Plan to better reflect an anti-racism programme:** It is noted that this is not an operational policing programme, yet the structure is cumbersome and hierarchical, closely following structures that exist in policing itself – despite it being reported that the structure of policing manifests racism and other forms of discrimination. Additionally, there are concerns around frequent personnel changes and “level of burden” on workstream coordinators. It is recommended the programme structure is flattened.
 - 2. Introduce tangible and measurable performance metrics:** It is noted that “actionable and meaningful metrics are missing from the Police Race Action Plan” and suggested that forthcoming reports or inspections that crossover with HMICFRS and IOPC are highlighted.
 - 3. Identify clear areas of focus:** The lack of prioritisation and activity in some key areas is noted to be concerning e.g. no focus on stop and search in the Plan despite it being a major driver of mistrust in police by Black communities. This recommendation also calls for better acknowledgement of intersectionality.
 - 4. Increase engagement with external stakeholders:** There is a lack of meaningful stakeholder engagement, noting this as a reason that Black communities and civil society organisations are reluctant to be involved with the police. This includes feelings of not being listened to, concerns of being “mined” for information, and names being listed in publications stating they have been consulted without demonstrable evidence their responses have been truly considered.
 - 5. Develop and deliver a clear communications strategy:** There has been limited communication with the public. When raised by the ISOB they were told communication should be left to local forces – despite clear areas of national ownership. This means lack of public awareness of positive work delivered by the programme. A Race Action Plan website is recommended along with regular public updates and an annual summit – the programme has committed to implement this throughout 2023.

Equality, Diversity and Inclusion Thematic (continued)

Summary/Findings (continued)

- 6. Improve the flow of information to the ISOB:** The ISOB has limited information on local delivery and information is not always shared as openly as expected.
 - 7. Provide adequate resourcing to the Plan:** Much of the day-to-day running of the Plan falls to workstream coordinators with no individual administrative support. Frequency of personnel changes is also noted as a difficulty. It is recommended the programme put in long-term structures to support organisational memory e.g. proper functioning human resources and project management systems. A commitment has been made from NPCC to consider structure and resourcing in the programme.
- Additionally, each workstream has specific recommendations for what should be included in the reiterated Plan and have flagged areas of concern which include:
 - Racial disparities in recruitment as part of the Police Uplift Programme
 - Lack of clarity on desired outcomes
 - Lack of scrutiny in local implementation
 - Lack of intersectional focus
 - Lack of focus in the Plan on technologies Black communities have expressed concerns about
 - Lack of external engagement
 - Siloed working
 - Poor resourcing

Previous oversight by the Authority

- At the Authority meeting in [May 2023](#), the Chief Constable stated: "institutional racism, sexism, misogyny, and discrimination exist. Police Scotland is institutionally racist and discriminatory. Publicly acknowledging these institutional issues exist in our organisation is essential to our absolute commitment to championing equality and becoming an anti-racist service".
- The interim findings report of the Equality, Diversity, Inclusion and Human Rights Independent Review Group (EDIHR IRG) was presented to the Authority in [May 2023](#) (progress reported in [September 2022](#) and [September 2021](#)).
- In [May 2023](#), a [progress update](#) on the Policing Together portfolio was presented to the Authority.
- In April 2023 there was a Deep Dive session with members of the PPC and the People Committee that considered the Joint Mainstreaming and Equality Outcomes Progress Report 2021-2023 – the final report is available [here](#).

Equality, Diversity and Inclusion Thematic (continued)

Previous oversight by the Authority (continued)

- Dame Angiolini's recommendations in the review into complaints handling, investigations and misconduct issues have national multiagency governance and reporting arrangements to oversee progress of actions to discharge recommendations. The Chair of the Authority and the Chief Constable are represented on the Ministerial Group that considers the recommendations proposed for discharge.

Future oversight by the Authority

- The Authority will continue to receive updates on the Policing Together: Equality, Diversity and Inclusion Strategy and its implementation. Additionally, at the Authority meeting in [August 2023](#) approval was given for an [oversight group](#) for the delivery of this strategy to be chaired by Authority Board Member Tom Halpin.
- A further interim report is due from the EDIHR IRG in Autumn 2023 and the final report in early 2024.
- The final report for the Joint Mainstreaming and Equality Outcomes will be due in April 2025.
- There are high level similarities between the key recommendations identified by the ISOB and the EDIHR IRG themes in their interim report. It is anticipated the EDIHR IRG will review this as part of their remit and Authority staff will be cognisant of specific recommendations when working with Police Scotland in this space.

External sources

- Police Professional - [Police Professional | Police Race Action Plan requires 'robust' restructure to achieve anti-racist aims, says ISOB](#) – 8th August 2023
- NPCC - [NPCC respond to ISOB report on the Police Race Action Plan](#) – 9th August 2023
- BBC - [Police Scotland: Racism, sexism and homophobia uncovered in review](#) – 23rd May 2023
- The Guardian - [Police Scotland chief constable says force is institutionally racist | Scotland | The Guardian](#) – 25th May 2023