SCOTTISH POLICE

Agenda Item 3.4

Meeting	SPA Policing Performance Committee
Date	11 October 2022
Location	Video Conference
Title of Paper	Hate Crime Improvement Plan – Progress Update
Presented By	ACC Gary Ritchie, Partnership, Prevention and Community Wellbeing
Recommendation to Members	For Discussion
Appendix Attached	YES APPENDIX A: REVISED PLAN AND PROGRESS REPORT

PURPOSE

The purpose of this paper is to provide a positional update on Police Scotland's Hate Crime Improvement Plan. The plan is being developed in response to recommendations identified during the Her Majesty's Inspectorate of Constabulary in Scotland (HMICS) Thematic Inspection of Hate Crime in Scotland, published in June 2021.

The plan was initially shared with HMICS on 3 December 2021 and presented to the Scottish Police Authority (SPA) Policing Performance Committee (PPC) on 9 December 2021. Due to unprecedented impacting factors, the redeployment of resources during early 2022 in response to Op Talla, greater abstractions to events and loss of staff due to retirement and transfer, original target dates were not achieved.

These delays were reported to HMICS and SPA resulting in an action at the PPC meeting on 7 June 2022 (Action: PPC 20220607-002). It was agreed Police Scotland would review, amend and report on an updated plan. This is now presented in the appendice.

Members are invited to discuss the contents of this report.



1. BACKGROUND

- 1.1 On 3 June 2021, HMICS published their Thematic Inspection of Hate Crime in Police Scotland which identified recommendations for improvement. In response to these actions Police Scotland began the formulation of the Hate Crime Improvement Plan.
- 1.2 Strategic and Tactical Hate Crime Working Groups were established to ensure effective coordination and collaboration of business areas to deliver this plan. The initial plan was compiled and submitted to HMICS and SPA in December 2021. The tactical group has been meeting monthly, checking progress against the plan across a number of interdependencies. It is agreed that both the associated Strategic and Tactical Hate Crime Working Groups will feed into other Police Scotland governance structures to ensure wider inter-dependencies and decisions are coordinated.
- 1.3 At present there is no project team or resource dedicated to this work and is instead being progressed by the Equality and Diversity team within Partnerships, Prevention and Community Wellbeing Division as '*Business as Usual'*.
- 1.4 A Potential Project Assessment (PPA) incorporating both the Hate Crime Improvement Plan and work associated with the impact of the aforementioned plan, has as yet not commenced. The Hate Crime and Public Order (Scotland) Act 2021, was presented to the Demand Management Board in March 2022, where approval was given to submit a full business case. The business case has been submitted to the Change Board for review.
- 1.5 Indicative timescales for the provision of a project team (assuming approval at other stages of governance) is estimated to be after October 2022 at the earliest.

2. FURTHER DETAIL ON THE REPORT TOPIC

2.1 This paper comes from an action at the previous meeting, where Police Scotland was tasked with reviewing, amending and providing a progress update on our Hate Crime Improvement Plan. Delivery has been challenging principally due to the reallocation of staff to assist with Op Talla in January and February, greater abstractions to events and loss of staff due to retirement and transfer, which could not have been factored in.



- 2.2 Since this committee last met, the associated Strategic Oversight Group has reviewed the previous plan with internal business areas and developed a new Hate Crime Improvement Plan. Due to the latest COS Crime delivery projections, we have separated the improvement plan into those recommendations which dependent on COS delivery, and those which are not.
- 2.3 On 23 August 2022, HMICS approved and closed 3 of the 15 recommendations, namely 4, 7 and 11 as they are now complete.
- 2.4 The new Hate Crime Improvement plan and associated progress can be found in the **Appendix A**. Included are details of the new target delivery date and a progression summary for each recommendation highlighting varying timescales, inter-dependencies, governance structures, external stakeholder engagement and levels of complexity.

3. FINANCIAL IMPLICATIONS

3.1 The PPA has been submitted to the Change board, with the initial assessment being that although the project is likely to not meet the £1million threshold, the complexities of the project and interdependencies with other projects, will require a business case and approval.

4. **PERSONNEL IMPLICATIONS**

4.1 Once the business case has been submitted and reviewed, then we will understand what resources will need to be allocated to deliver this work. In the meantime, the action plan will be stripped of COS/training interdependencies to ensure focus on what can be achieved.

5. LEGAL IMPLICATIONS

5.1 Not applicable

6. **REPUTATIONAL IMPLICATIONS**

6.1 Our inability to implement the new Hate Crime & Public Order Act, and ensure our duties with respect to providing data to Scottish Government, will have significant public confidence impacts, particularly as the Act is extremely contentious in parts of society.



7. SOCIAL IMPLICATIONS

7.1 Our inability to implement the new Hate Crime & Public Order Act, and ensure our duties with respect to providing data to Scottish Government, will have significant public confidence impacts, particularly as the Act is extremely contentious in parts of society.

8. COMMUNITY IMPACT

8.1 Our inability to implement the new Hate Crime & Public Order Act, and ensure our duties with respect to providing data to Scottish Government, will have significant public confidence impacts, particularly as the Act is extremely contentious in parts of society.

9. EQUALITIES IMPLICATIONS

9.1 Our inability to implement the new Hate Crime & Public Order Act, and ensure our duties with respect to providing data to Scottish Government, will have significant public confidence impacts, particularly as the Act is extremely contentious in parts of society.

10. ENVIRONMENT IMPLICATIONS

10.1 Not applicable.

RECOMMENDATIONS

Members are invited to discuss the contents of this report.



APPENDIX A – REVISED PLAN AND PROGRESS REPORT

The table below lists the 15 recommendations, the revised target date for each alongside a progress summary and next steps. Some actions have been moved between categories to separate COS/training dependent actions. It should be noted that for any recommendation to be formally discharged by HMICS, an evidence submission form should be completed and reviewed by Police Scotland's Governance, Audit and Assurance department before being uploaded to HMICS for consideration. Progress summaries below come from evidence submission forms.

	PART A – RECOMMENDATIONS AND ACTIONS WHICH HAVE NO SIGNIFICANT DEPENDENCY ON THE NATIONAL COS CRIME ROLL-OUT AND ASSOCIATED IMPLICATIONS FOR TRAINING AND ARE BEING PROGRESSED AS BUSINESS AS USUAL						
Recommenda tion	Proposed additional actions	Revised Target Date	Progress summary	Next Steps			
R01 Hate Crime Profile	1. APU to establish the scope and rationale for HC to be	01/12/2022	Originally this work was scheduled to be complete by 01/06/2022.	The target dates have been re-aligned to reflect the Strategic Assessment			
Police Scotland should review the profile of hate crime in	included in the Strategic Assessment Process.		Work has commenced on the next strategic assessment and Hate Crime will be researched	process. Further engagement with Strategy and Innovation			
strategies and plans, given that it is not currently identified as a	2. Develop process within the APU to develop appropriate analytical products in response to the		and analysed as a stand-alone section as part of this work. The evidence will be risk assessed using the MORILE risk	will be undertaken as local policing plans develop			

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standalone strategic priority for the force"	identified approach to the Strategic Assessment.	assessment and operational SMEs will be included in these processes linked to the Strategic Assessment.
	3. Submit proposal, including full document set for hate crime which	Progress will be aligned to the Strategic Assessment process.
	makes provision for HC to be included in Local Policing Plans which clearly defines responsibilities and improves consistency. (Realigned from R02 due to crossover with strategic assessment process)	Strategy and innovation are presently conducting a review of how local policing plans are produced in line with the national Strategic Assessment with local autonomy. Where hate crime emerges in the strategic assessment it will subsequently flush through to local policing plans.
	4. Identify improvements to Local Policing Plans which captures activities and learning at local levels - feed this learning through	

	EDIHR SOB (Realigned from R05 due to crossover with strategic assessment process)			
R02 National Policy and Local Delivery Coordination Police Scotland should ensure the national policy direction for hate crime links up with the local delivery and response to hate crime	 Review governance structures for Hate Crime across policing to ensure they facilitate the understanding of trends and sharing good practice within local policing and C3. Design a standardised approach and structure which provide for resilience and increased interaction and reporting between PPCW, C3 and Local Policing Divisions. 	01/12/2022	Originally this work was scheduled to be complete by 01/12/2022. The SLWG looking at hate crime governance structures across territorial divisions and C3 has proposed a revised and more consistent structure. This was circulated to service delivery departments across divisions and feedback analysed. It became clear that the changes proposed were too significant for local divisions to implement at this stage. This was principally due to their differing structures and crime management systems. The paper has been revised to present a more achievable	The new governance structure will be rolled out and the national guidance documents updated. COS roll-out will provide the opportunity for automation of some processes and a more consistent structure determined.

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	3. Implement agreed governance structure and processes across PPCW, Local Policing Divisions and C3.		solution, re-circulated through divisions and agreed at the Hate Crime Improvement Tactical Group and by the Hate Crime Strategic Oversight group.	
R03 Dedicated Hate Crime Unit Police Scotland should consider establishing a dedicated unit for hate crime.	 Gather information on the effectiveness and evidence of improved service delivery of other PS dedicated crime units (i.e. PPU). Compare and contrast these units with the present PPCW E&D Team with regard to role, capacity and effectiveness in respect of hate crime. Identify best practice from outwith PS in relation to HC structures. Complete options 	01/02/23	Originally this work was scheduled to be complete by 01/06/2022. Internal scoping has taken place with Police Scotland's Domestic Abuse Task Force and the Rape Task Force looking at their roles, remits, governance and structures. Police Scotland have engaged with NPCC Hate Crime Secretariat and the UK Policing Diversity, Equality & Inclusion Consortium to understand the position for dedicated Hate Crime Units in England and Wales Forces.	An options paper is presently being prepared. Any decisions on a future unit should align with the strategic workforce plan.

	paper on the feasibility of a dedicated hate crime unit for consideration of the strategic group.			
R04 SPA Scrutiny Improvements The Scottish Police Authority should consider how to improve its scrutiny of Police Scotland's response to hate crime	 Request that PS include Hate Crime in quarterly performance reports to PPC to ensure members are provided with regular data and narrative to allow them to consider the PS response to hate crime) SPA PPC will request regular updates on the Hate Crime Improvement Plan from Police Scotland to allow them to request any further detail they feel is required to 	01/10/22	Originally this work was scheduled to be complete by 01/01/2022. Regular updates on the hate crime improvement plan are being provided at quarterly SPA PPCs	The work is complete and an evidence submission form will be submitted shortly which aims to address the recommendations.

	undertake scrutiny.			
R05	1. Establish	01/03/23	Originally this work was	Actions have allocated at
Partnership	information sharing		scheduled to be complete by	Hate Crime Improvement
Relationships	arrangements for		01/05/2022.	Tactical Group to address
and Knowledge	local scrutiny boards			information management
Sharing	and partnerships and		Work is now ongoing with APU	issues.
	seek to maximise		and Information Assurance to	
Police Scotland	these within the		expand the provision of Hate	Actions 3 and 5 are
should ensure	limits of existing IT		Crime reporting to all local	presently being explored.
that it	structures and		policing divisions and where	
maximises the	information sharing		technology and data protection	Actions 2 and 4 are
benefits of	constraints		regulations permit, enhance the	largely complete.
strong			depth of information available. A	
partnership	2. Establish regular		SLWG has been established to	
relationships,	forums between local		look specifically at information	
and	policing E&D SPOCS		sharing within the constraints of	
shares the	and PPCW E&D, to		the present IT system. These	
knowledge of	develop processes for		discussions include a proposal to	
diversity issues	continuous		empower divisions to share	
developed by	improvement,		crime statistical information	
police officers	organisational		through a self-service	
and staff	learning and promote		application with appropriate	
working in	best practice.		guidance and any necessary	
Safer			GDPR protections. This work is	
Communities	3. Gather information		paused owing to the need to	
roles at	across PS Local		establish a fix for the disclosure	
national and	Policing Divisions in		of small data sets.	
local levels	relation to processes			

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for networks a	nd	Since May 2021, PPCW E&D	
relationships for	or the	dept have met regularly with	
sharing of simi	ilar	E&D SPOC's in local policing.	
diversity issue	S	Attendees have provided	
		positive feedback on the	
4. Engage with	n APU	creation of the forum and the	
in relation to		opportunity to raise issues,	
improvements	to	concerns and good practice to	
trends analysis	5,	the national team.	
repeat victim a	analysis		
and the develo	pment	Information has been gathered	
of local area p	rofiles	from local policing division	
utilising the H		regarding diversity networks.	
dashboard.		There is a significant degree of	
(Realigned from	m R10	parallel work ongoing within	
as cos indepen	ident)	Police Scotland which can	
		inform this part of the	
		recommendations such as the	
5. Identify goo	d	Seldom Heard Communities	
practice in rela	ition to	work and a proposal from	
local approach	es	Strategy and Innovation to map	
which demonst	trate	networks across the country.	
the impact on			
communities a	nd	The hate crime dashboard has	
access to justic	ce	been significantly upgraded with	
system which	will	the ability to identify trends and	
also inform		repeat victims at local level.	
recommendati	on 2.		

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	(Realigned from R10 as cos independent)			
R06 Third Party Reporting Improvements Police Scotland should accelerate its work with partners to improve the Third Party Reporting arrangements, providing people with the option to report hate crime without speaking directly to the police	 Engage with Scottish Government Tackling Prejudice and Building Connected Communities Action Group to develop an agreed approach and responsibilities across all partners. Develop processes, activities and reporting arrangements for PS owned activities, contributing to the wider TPR. Develop, implement and evaluate a process for measuring the 	01/03/23	Originally this work was scheduled to be complete by 01/06/2022. Police Scotland have carried out a review of existing 400 Third Party Reporting Centres across each of the 13 Local Policing Divisions. Scottish Government have advised that they are working to re-convene the Tackling Prejudice and Building Connected Communities Group – with a new name and Terms Of Reference. Until this group meets there is no progress which Police Scotland can make. Timescales realigned accordingly.	Police Scotland to engage with HMICS and Scottish Government over the progress of this recommendation

R07 National	performance and effectiveness of TPR centres 1. Review the	01/10/22	Originally this work was	The campaign has
Hate Crime Campaigns - Transparency and Impact Police Scotland should ensure there is transparency of decision making about the themes chosen for national hate crime campaigns, and that there are processes in place to evaluate the impact of campaigns on communities and reporting	 approach to hate crime campaign planning in conjunction with Scottish Government and key stakeholders such as community groups and Diversity Staff Associations. 2. Develop approach which better engages stakeholder groups in the planning and prioritisation of hate crime campaigns. 3. Develop a campaign plan in consultation with different groups; provide feedback to diversity staff associations and 		 Originally this work was scheduled to be complete by 01/05/2022. Police Scotland Hate Crime Campaign launched on 28th March. It will utilise the new Corporate Communications Strategy which: Outlines the approach to stakeholder engagement; highlights the range of internal/external stakeholders, PS approach to campaigns, using OASIS model as used by Scottish Government to identify relevant target audiences for each individual campaign. Corporate Communications Evaluation Strategy outlines the approach to measures and communications; based on International Association of 	concluded and analysis complete. An evidence submission form will be submitted shortly which aims to address the recommendations.

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levels of hate crime	 community groups. 4. Design a set of metrics to evaluate hate crime campaigns. 5. Develop internal and external communications process to inform community groups, DSA's of the outcomes of the hate crime campaigns. 		Measurement and Evaluation of Communications (AMEC) framework and Barcelona principles to define qualitative and qualitative measures adapted to individual campaigns. Hate Crime Campaign has been completed – awaiting evaluation before reporting	
R09 Intelligence Log Submission Guidance Police Scotland should provide clear guidance to police officers about	1. Refreshed communication to officers around the need to submit SID entries and establish a process to measure and improve compliance.	01/10/22	Originally this work was scheduled to be complete by 01/12/2022. In May 2021 the National Intelligence Bureau circulated a National Bulletin. This was created to provide clear guidance and encouragement to officers in relation to the	The work is largely complete and an evidence submission form will be submitted shortly which aims to address the recommendations.

the importance of submitting intelligence logs relating to hate crimes and hate incidents			submission of intelligence regarding hate crime and hate related incidents. Since the intelligence bulletin was circulated there has been a 57% increase in the number of intelligence logs related to hate crime / incidents across Scotland compared with the previous five months. In September 2021 this bulletin was re-circulated to all divisions for inclusion in their daily briefings to ensure that it remains at the forefront of officer's minds.	
R11 Benchmarking - Hate Crime Good Practice Police Scotland should consider good practice elsewhere to	1. SPA officers will work with Police Scotland, through the benchmarking practitioner group, to identify areas for further exploration and research in relation to good practice in other	01/10/22	Originally this work was scheduled to be complete by 01/09/2022. SPA and Police Scotland Benchmarking Practitioner Group (BPG) have been engaging heavily with the key stakeholders for Hate Crime and have identified appropriate	The work is largely complete and an evidence submission form will be submitted shortly which aims to address the recommendations.

improve its	jurisdictions.		qualitative benchmarks for the	
response to	Julisaletions.		sharing/seeking of best practice	
hate crime.	2. Police Scotland to		in relation to Hate Crime	
The Scottish	provide regular			
Police	updates on the			
Authority	gathering of best			
should use				
information	practice examples to HC SOB and SPA			
	PPC.			
about good	PPC.			
practice	2 DC to develop			
elsewhere to	3. PS to develop			
ask more	briefing paper which			
effective	considers how good			
questions of	practice elsewhere			
Police Scotland	can inform HS			
about its	structure and			
response to	practices.			
hate crime		01/10/00		
R13 Hate	1. Review and	01/12/22	Originally this work was	Work is well advanced
Crime	analyse data in		scheduled to be complete by	although the timescales
Perpetrated	relation to identify		01/05/2022.	have been revised to
Against	the volume and			account for some
Officers and	nature of HC		A Welfare Assessment tool has	technical issues with
Staff	perpetrated on police		been developed and signed off	data.
	officers and staff.		via PPCW and P&D governance.	
Police Scotland			This will now progress via	Papers require to be
should review	2. Utilise the Your		various boards before	updated and escalated
its approach to	Safety Matters		implementation.	but there is a well-

dealing with hate crime experienced by police officers and staff on duty and providing effective support. Data should be collected to identify the volume, nature and extent of hate crime perpetrated against police officers and staff	feedback to inform improvements to existing process and support arrangements. 3. Engage with staff associations / YSM sub group to work collaboratively with E&D to create a support package for Police victims of hate crime which includes improving all officers understanding of the impact it may have on their colleagues. 4. Present briefing paper on proposal to enhance PS approach and support for officers and staff to EDI &HR SOB.		Strategy and Innovation have carried out research by interviewing victims of hate crime in several pilot divisions. Results will be presented at YSM hate crime sub-group meeting. The broad nature of the recommendation has resulted in it now coming under the joint ownership of People and Development, PPCW and DPU	established structure in place.
R14 Hate Crime Champions and	 Review, redesign and identify improvements for 	01/06/23	Originally this work was scheduled to be complete by 01/09/2022.	Good progress on HCA course and focus was required to create a cadre

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Hate Crime Advisors - Role	Hate Crime Advisor and Hate Crime	The HCA course was completely	for Op Urram and events. Further training of HCA
Review	Champion Courses.	re-written following feedback from previous HCA's and	being prioritised over HCC at this stage.
Police Scotland should review the role, remit, training and deployment of Hate Crime Champions and Hate	 2. Commence roll outs of new Hate Crime Advisor and Hate Crime Champion Courses. 3. Collate information on the location and 	research ensuring the course was fit for purpose. This also included benchmarking with other UK forces and consultation with NISAG on the new course aims/objectives. A HCA role profile has been	HCC course still to be revamped and rolled out, expect the target dates will not be met due to the capacity of the department to roll out the training.
Advisors	deployment of Hate Crime Advisors and Hate Crime Champions to identify good practice and establish a forum to capture, share and	created and participants are assessed as part of the new course. Hate Crime Advisor Aide Memoire issued to all Local Commanders and Heads of	
	disseminate learning.	Department advertising the specialism as well as created a flowchart of how to request a HCA.	
		As of July 2022, 58 officers have been trained as Hate Crime Advisors with operational deployments to 16 separate	

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			events Hate Crime Champions course is still running but the revision of the course has been put on hold owing to a staffing levels	
R15 Cyber Crime Investigations - Hate Crime and Diversity Considerations Police Scotland should ensure that knowledge of hate crime and diversity is included in its consideration of the necessary skill set for planned cybercrime investigators	 Engage with Cyber Strategy Implementation Programme to identify skill/training requirements in respect of Hate Crime for Cyber Crime Investigators. Develop role profiles and training interventions for Cyber Crime Investigators. Review the impact of interventions post implementation of the cybercrime investigator role and report on the 	01/06/23	Originally this work was scheduled to be complete by 01/09/2022. Cyber Crime have developed a first responder's guide for investigators which is being reviewed by PPCW E&D to determine how it should interface with existing hate crime guidance. Worked examples and scenarios are being developed A First Responders Guide (FRG) is now available on the intranet and provides several links to investigative opportunities for Cyber enabled/dependant crime.	A work stream to upskill staff in being able to identify and investigate cyber enabled / dependant crimes and a new Cyber App is presently being developed

	effectiveness of these interventions.					
PART B – RE	PART B – RECOMMENDATIONS AND ACTIONS WHICH HAVE A DEPENDENCY ON THE NATIONAL COS CRIME ROLL-OUT AND ASSOCIATED IMPLICATIONS FOR TRAINING					
R08 Hate Crime National Document Review Police Scotland should review hate crime national documents to ensure there is clear accessible guidance for officers and staff responding to and recording hate crime	 Review hate crime specific guidance through evaluation and feedback of its application and effectiveness operationally. Review hate crime documentation in relation to other relevant guidance, SOPS and legislation. 	01/08/23	Originally this work was scheduled to be complete by 01/12/2022. The document review will be an ongoing process as different parts of the improvement plan develop	The document suite should be continuously updated but the reality is that most updates will require to be reviewed after COS roll-out. Therefore the target dates needs to be aligned with COS.		
R10 IT Systems Data Review - Hate	1. Review the policy for how hate crimes and incidents will be	01/08/23	Originally this work was scheduled to be complete by 01/12/2022.	The proposed new operating model will need to be further developed		

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Crime	recorded following		with the risks,
Knowledge and	the rollout of the	A SLWG has met to develop a	opportunities and options
Trends	national crime	position on a potential new Hate	developed in further
	recording system. In	Crime Operating Model.	detail.
Police Scotland	particular the role of		
should review	iVPD and any impact	This aims to utilise the new	The business case will be
its use of the	for sharing data with	National Crime System as the	developed to establish a
data held on IT	partners.	single source for all hate crime	project team to takes this
systems to	(Realigned to R02	data. There are various options	task on alongside training
build	from R10 owing to	and complexities associated	and data collection
knowledge and	COS dependency)	with information management,	considerations associated
understanding		the role of iVPD and legacy	with the new Hate Crime
of trends in	2. Design and	data.	and Public Order
hate crime and	implement new hate		(Scotland) Act.
the impact on	crime operating	These have been explored	
affected	model (new action)	within the SLWG, Hate Crime	
communities		Tactical Group and Risk and	
	3. Engage with DEPP	Harm Data Owners group.	
	in relation to the		
	expectations and	A potential project assessment	
	processes for	for a dedicated project team to	
	Intelligence Logs	examine these changes has	
	within the national	been approved and an interim	
	rollout of COS.	business case is presently being	
	Update hate crime	developed.	
	guidance documents		
	where necessary	Separately, the hate crime	
	(Realigned to R10	dashboard has been developed	

	from R09 owing to COS dependency) 4. Review HC dashboard to identify additional functionality that will emerge from the national COS rollout. 5. Engage with local partnerships to develop proactive processes and targeted interventions for single and repeat victims.		with the functionality to include repeat victims to be identified at divisional level. This affords intervention opportunities.	
R12 Hate Crime Training Review Police Scotland should review	1. Complete strategic review of all training courses to establish if hate crime should be included.	01/08/23	Originally this work was scheduled to be complete by 01/02/2023. LTD currently reviewing previous review of ops training	Wider training requirements will be influenced by implementation of Hate Crime and Public Order (Scotland) Act and COS

and revise hate		and associated implementation	roll-out.
crime training	Training Strategy	plan.	
at all levels as	develop a		The business case will be
a matter of	communication plan		developed to establish a
urgency	and training needs		project team and training
	analysis for Hate		options will be
	Crime training		incorporated into same.
	products supported		
	by key stakeholders		
	including but not		
	limited to PPCW,		
	CJSD and Legal		
	Services to reduce		
	silo working and		
	develop a cohesive		
	approach for the		
	development and		
	delivery of Hate		
	Crime training.		
	3. Consider how we		
	will embed		
	organisational		
	learning into training		
	products to ensure		
	they are future		
	proofed, and consider		
	how we will capture		
		1	

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4. Develop implementation plan for the identified improvements, taking account the impact of the national COS rollout training and processes and also implication arising from the implementation of the Hate Crime Bill.	this.	
	implementation plan for the identified improvements, taking account the impact of the national COS rollout training and processes and also implication arising from the implementation of	

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