

Race and policing

A review of the police service's
leadership and governance
arrangements for race-related matters

Contents

Summary	1
Introduction	7
Leadership and governance arrangements	10
Home Office	10
NPCC	11
NPCC diversity, equality and inclusion strategy 2018–2025	12
Police Race Action Plan 2022	14
Anti-racist action plans in Wales	17
Police and crime commissioners	17
Association of Police and Crime Commissioners	18
College of Policing	18
The lack of accurate data about race	20
Background	20
Police data	20
Victims	22
Stop and search	23
People arrested or subject to criminal justice decisions	24
Annex A: Relevant reports and reviews	26
Annex B: External reference group membership	27

Summary

Introduction

In July 2021, the Home Affairs Committee published [The Macpherson Report: Twenty-two years on](#). The committee considered the role we had played in assessing the police's progress in addressing the recommendations made by the Stephen Lawrence Inquiry. It concluded:

“It has been far too long since the inspectorate conducted a thematic review on race. There is an urgent need for [His Majesty's Inspectorate of Constabulary and Fire & Rescue Services] HMICFRS to address race directly in its inspections.”

The committee recommended that we should carry out a series of inspections of race and policing to start in 2022. This short review is the first inspection in that series. It considers the effectiveness of the national leadership and governance arrangements that relate to race and policing.

Alongside this review we have also published an [inspection report on race disparity in police criminal justice decision-making](#).

Terminology used in this report

Section 9 of the [Equality Act 2010](#) states that race includes colour, nationality and ethnic or national origins. In our report, we also use the word 'ethnicity' in a broader sense to cover all aspects of race.

Our reports contain references to, among other things, 'national' definitions, priorities, policies, systems, responsibilities and processes. In some instances, 'national' means applying to England and Wales. In others, it means applying to England, Wales and Scotland, or the whole of the United Kingdom.

In March 2021, the Commission on Race and Ethnic Disparities recommended that the Government stop using the term 'Black, Asian and minority ethnic (BAME)'. It recommended this because the terms 'BAME' and 'Black and minority ethnic' (BME) emphasise certain ethnic minority groups (Asian and Black) and diminish others (Mixed, Other and White ethnic minority groups). The terms can also mask disparities between different ethnic groups and create misleading interpretations of data. Any instances of 'BME' or 'BAME' are used only in the context of direct quotes in this report.

Leadership and governance arrangements

The Home Office

The Home Office sets the long-term strategic direction for policing and holds forces to account on how they provide services. We found positive evidence of leadership in the [Police Uplift Programme](#), where there was an emphasis on recruiting and retaining a more diverse workforce. But most people we interviewed, including senior police leaders, said that work on race and policing would benefit from greater involvement and support from the Home Office, as this would give it more impetus.

We have seen how greater Home Office involvement has helped other areas of policing, such as work to improve the approach to violence against women and girls. This has included support for work to improve the quality of rape investigations and outcomes through [Operation Soteria](#), and the addition of violence against women and girls to the [Strategic Policing Requirement](#).

But there was also a broad acceptance among those we spoke to that primary responsibility for improvement in the area of race and policing rests with the [National Police Chiefs' Council \(NPCC\)](#) and senior police leaders.

The NPCC

The NPCC is organised into 11 co-ordination committees, each of which has several working groups and portfolios reporting on different elements of policing. These committees work to the [NPCC Strategic Plan 2021–2025](#).

A chief officer chairs each committee and portfolio. Their role is to oversee national activity, encourage best practice and support collaboration with other support groups and interested parties. This is in addition to their full-time duties leading forces.

We were told that the complex structure of the various portfolios and co-ordination committees restricts the NPCC's ability to carry out improvement activity.

Diversity, equality and inclusion co-ordination committee

A chief constable chairs the NPCC's diversity, equality and inclusion co-ordination committee, which is responsible for the 2018–2025 diversity, equality and inclusion strategy.

We found that the 2018–2025 strategy and its associated toolkits didn't receive widespread support from forces. Senior leaders we spoke to said the strategy needed to be refreshed and re-introduced. We agree.

A new strategy is due to be published in 2025, but increased momentum is needed before then. We were told that the 2018–2025 strategy, now a joint strategy with the [College of Policing](#), had been refreshed and was ready for circulation to forces. But it hasn't yet been published.

Recommendation 1

As soon as practicable, and no later than 31 March 2024, the [National Police Chiefs' Council](#) lead on diversity, equality and inclusion and the [College of Policing](#) should publish the revised 2018–2025 diversity, equality and inclusion strategy. This revised strategy should address fully the matters raised in [The Macpherson Report: Twenty-two years on](#) and include requirements for:

- forces to self-assess their implementation of the strategy;
- National Police Chiefs' Council reviews of force self-assessments and/or College of Policing peer reviews; and
- sharing organisational learning within the police service from these reviews.

Police Race Action Plan

In May 2022, the NPCC and the College of Policing published the first version of a [Police Race Action Plan](#) for consultation.

The plan acknowledges the uncomfortable history of relationships between the police and Black communities. It includes a commitment to enforcing a zero-tolerance approach to racism in policing.

Some senior police officers and leaders within other organisations told us the pace of work on developing and implementing the plan has been too slow. We agree.

One reason for this slow progress has been a protracted debate between senior police leaders on whether the plan should continue to attribute the term “institutional racism” to the police service. Some people we spoke to voiced frustration that it had absorbed so much time and ended without resolution.

The NPCC should reinvigorate its work on the plan to make sure a second version is finalised and published as a matter of urgency. Once the plan is published, forces should implement it without delay.

Recommendation 2

As soon as possible, the [National Police Chiefs' Council](#) and the [College of Policing](#) should finalise and publish the Police Race Action Plan. Forces should implement this plan, following its publication, without delay.

Anti-racist action plans in Wales

In July 2022, the Welsh Government published its [Anti-racist Wales Action Plan](#). The plan sets out actions and performance measures that relate to both the public and private sectors, including actions for the criminal justice system.

In September 2022, the [Criminal Justice Anti-Racism Action Plan for Wales](#) was introduced. The plan, commissioned by the Criminal Justice Board for Wales, contains seven commitments that aim to establish an anti-racist approach across all sectors of the criminal justice system in Wales and is supported by funding from the Welsh Government and criminal justice agencies across Wales.

We haven't assessed the effectiveness of this work because it is still in its early stages. But its cross-sector approach, co-ordinated and supported by Government, could provide a helpful model for implementing the Police Race Action Plan.

Police and crime commissioners

[Police and crime commissioners](#) set objectives for police and crime in their area by issuing a police and crime plan. The plan should reflect both the strategic policing requirement and local community priorities, and is issued after consultation with the chief constable.

Since December 2020, the [Association of Police and Crime Commissioners \(APCC\)](#) has published a race disparity toolkit approximately every six months. This aims to help support members to tackle race disparity locally, in part through sharing good ways of working.

The [APCC's Strategic plan 2022–24](#) states that 37 of the 43 police and crime plans had priorities on equality, diversion and inclusion. But of the eight police and crime plans we reviewed, race was prioritised in just one. Four of the eight plans made no mention of race, diversity, equality or inclusion.

We would encourage those police and crime commissioners who haven't yet made race and policing a priority to reflect on whether it is time to do so.

College of Policing

Representatives of the NPCC and the APCC we interviewed were generally complimentary about the College's work relating to race and policing.

We were told the College had played an important role in responding to the recommendation about racism, diversity and equality training in *The Macpherson Report – Twenty-two years on*.

However, this report called for “clear national standards” on anti-racist training to be drawn up. The College told us it has revised the national police training curriculum for diversity, equality and inclusion. But at the time of our review, there were still no national standards on race or diversity training. This has contributed to significant inconsistencies between forces.

Recommendation 3

By 31 March 2024, the [College of Policing](#) should establish national standards for police diversity, equality and inclusion training.

The lack of accurate data about race

It is important for Government and police leaders to make sure they have the best possible information about how policing services are provided to all parts of society. This includes how people from different ethnic minority backgrounds are represented and treated within the criminal justice system.

In this report, we examined data on crimes recorded during 2021–22 where a victim was identified. What we found was worrying.

In 61 percent of all records, the ethnicity of the victim was missing. In addition, 26 percent of records had no stated sex and 27 percent had no stated age. This means forces are unable to accurately assess the full impact of crime, or the quality of their service, on people from different demographic groups. This situation presents a real risk to any plans for improving the service provided to women and girls, and to plans aimed at improving diversity, equality and inclusion more generally.

But this is far from a new inspection finding. The police’s failure to record sufficient information about the ethnicity of people they deal with is a persistent and widespread problem across police forces in England and Wales. Since 2017, we have published 30 different reports in which we state that the problem exists and explain why it is important that the police take action to address it. We have made ten separate recommendations and identified areas for improvement.

It is deeply regrettable that, despite all the recommendations we have made over many years, the situation hasn’t improved.

People we spoke with told us that the NPCC’s diversity, equality and inclusion co-ordination committee is leading a project to develop a new approach for recording and collating data on [protected characteristics](#).

At the time of this report’s publication, there remains a major question mark over whether this project will lead to the improvements needed, and whether it will do so within a reasonable time frame.

But it would be unfair to prejudge the project's outcome. At this stage, we are content to add our support to the work, in the form of the following recommendation:

Recommendation 4

By 30 April 2024, the [National Police Chiefs' Council](#) and [College of Policing](#) should jointly implement the technology solutions and training required to make sure forces consistently record and share data on [protected characteristics](#), in particular with regard to race (colour, nationality, and ethnic or national origins).

Introduction

Background

In December 2018, the Home Affairs Committee announced its intention to review progress on the recommendations of the [Stephen Lawrence Inquiry](#) (the Macpherson report). This included a review in particular of “progress in relation to increasing the number of BME officers, efforts to ensure a diverse and inclusive culture within the police service, race equality training within the service and the reporting of racist incidents and crimes”. The resulting report, [The Macpherson Report: Twenty-two years on](#), was published in July 2021.

The committee considered the role we had played in assessing the police’s progress in addressing the recommendations made by the Stephen Lawrence Inquiry. It concluded:

“It has been far too long since the inspectorate conducted a thematic review on race. There is an urgent need for HMICFRS to address race directly in its inspections. HMICFRS should always include specific questions about race and the workforce (including recruitment and disciplinary procedures, and officer and staff attitudes to race) and workplace operations in its PEEL legitimacy inspection framework. Further, given that matters of race remain a problem across the police service, we can identify no logical reason as to why HMICFRS have discontinued regular thematic reviews of race and policing. In order to provide scrutiny of the service and to evidence its own commitment to the issue we therefore recommend that these reviews are reinstated as a matter of priority and that the first such review should take place no later than 2022.”

As a result of this recommendation we included a series of inspections of race and policing in our [Policing inspection programme and framework](#). These inspections started in April 2022.

We started the series with this short review. It considers the effectiveness of the national leadership and governance arrangements that relate to race and policing.

Alongside this review we have also published an [inspection report about race disparity in police criminal justice decision-making](#).

In that inspection, we found systemic and long-standing problems in the collection of ethnicity data. Because these problems are attributable (in whole or part) to shortcomings in the police's leadership and governance arrangements, we decided to publish both reports together and to include a summary of the relevant findings and recommendations from that inspection in this report.

In subsequent inspection reports, we intend to examine race disparity in:

- police workforce-related matters; and
- public trust and confidence in the police.

About us

HMICFRS independently assesses the effectiveness and efficiency of police forces and fire and rescue services, in the public interest. In preparing our reports, we ask the questions that the public would ask, and publish the answers in accessible form. We use our expertise to interpret the evidence and make recommendations for improvement.

Terms of reference for this short review

Our terms of reference for this review were to:

- provide a snapshot of the relevant national leadership and governance arrangements and assess their effectiveness;
- provide a foundation for our wider inspection activity, including but not limited to thematic inspections on race and policing; and
- make recommendations for the police service to improve national leadership and governance relating to race and policing.

Methodology

Document review

We carried out a document review of strategies, policies, [force management statements](#), police and crime plans, and agendas and minutes from national and local meetings, as well as supporting documents. A list of the most significant published documents is given in [Annex A](#).

Interviews

We carried out 34 interviews. These included interviews with:

- the NPCC leads with responsibility for policing portfolios that covered diversity and/or race;
- the chair of the NPCC;
- the chief executive officer of the College of Policing;
- Home Office officials;
- police and crime commissioners and officials from the APCC who had relevant national leadership responsibilities;
- national police staff association representatives;
- the chair of the Police Race Action Plan's independent scrutiny and oversight board;
- diversity, equality and inclusion leads from eight forces; and
- officials responsible for implementing the Anti-racist Wales Action Plan.

Focus groups

We carried out two focus groups. These consisted of:

- the heads of diversity, equality and inclusion from the eight fieldwork forces; and
- the heads of learning and development from the same eight forces.

External reference group

We discussed our approach and findings with an external reference group, which was set up for these inspections. The group included representation from the police service, Government and other organisations. A full list of the group's membership is given in [Annex B](#).

Leadership and governance arrangements

Home Office

In July 2019, the Home Office set up the [National Policing Board](#), which is chaired by the Home Secretary. It is designed to allow the Home Secretary to:

- directly work with the policing sector to set the long-term strategic direction for policing; and
- hold the policing sector to account for implementing the Government's key policing commitments, including the ambition to recruit 20,000 additional police officers.

We found evidence of the Home Office holding the police to account in respect of race and policing-related matters. For example, the Policing Minister regularly wrote to all chief constables, requesting progress reports on their diversity recruitment figures in relation to the [Police Uplift Programme](#).

The Home Office is also developing minimum standards for community involvement in the scrutiny of how the police use certain powers. This work started as a result of a proposed action in the Government report [Inclusive Britain](#).

Most people we interviewed from the NPCC, the APCC and the College of Policing stated that work on race and policing would benefit from greater involvement and support from the Home Office. We have seen how greater Home Office involvement has helped other areas of policing, such as work to improve the approach to violence against women and girls. This has included support for work to improve the quality of rape investigations and outcomes through Operation Soteria, and the addition of violence against women and girls to the Strategic Policing Requirement.

The Home Affairs Committee considered the role of the Home Office in *The Macpherson Report: Twenty-two years on*. It concluded:

“The withdrawal of the Home Office from an active role in policing has also been responsible for fragmentation in addressing race equality issues. We do not believe that the current structures will be sufficient to deliver change that is already twenty-two years overdue.”

We support these views. We would like to see the Home Office take a more active oversight role in the work of the police in relation to race. Matters connected with race and policing may well benefit from greater Home Office direction.

NPCC

We wanted to understand how the NPCC works to tackle racism in policing. Although the police have made changes, progress has been slow. The Home Affairs Committee report, *The Macpherson Report: Twenty-two years on*, concluded:

“In the years following the Macpherson report there was a welcome focus by all policing organisations to implement the report’s recommendations and drive forward institutional change. However, over time that progress has stalled, and race equality has too often not been taken seriously enough.”

NPCC co-ordination committee structure

The NPCC is organised into 11 co-ordination committees, each of which has several working groups and portfolios reporting on different elements of policing.

A chief officer chairs each committee and portfolio. Their role is to oversee national activity, encourage best practice and support collaboration with other support groups and interested parties.

Chairs of committees and portfolios take on these roles in addition to their full-time duties leading forces. Many do the work because of their commitment to the subject area. There is limited national support for these leaders and they often rely on administrative support from their own force.

In 2021, the NPCC carried out a review of its governance arrangements. The report stated that “the current co-ordinating committee and portfolio structures were too complex and required considerable time and effort to navigate, agree and deconflict responsibilities and keep all relevant leads briefed”.

Most people we spoke to expressed a similar view. This led us to conclude that the complexity described is contributing to the police service’s inability to make enough progress on race and policing.

Diversity, equality and inclusion co-ordination committee

A chief constable chairs the NPCC’s diversity, equality and inclusion co-ordination committee. The committee’s terms of reference state:

“The Diversity, Equality, and Inclusion Co-ordination Committee (DEI) has direct responsibility for ensuring delivery and implementation of the NPCC Diversity Strategy and associated toolkits, which give clarity of leadership and action that is required by the police service across three categories: our organisation, our communities, and our partners. It will also direct and co-ordinate work of individual portfolios that cover all nine protected characteristics.”

The nine portfolios that report directly to this committee are:

- disability;
- gender;
- age related;
- Gypsy, Roma, Traveller;
- hate crime;
- human rights;
- LGBTQ+;
- race; and
- religion and belief.

The work of the diversity, equality and inclusion committee overlaps with that of several other NPCC co-ordination committees and their respective portfolios.

The work of the diversity, equality and inclusion co-ordination committee portfolios

We were told that the race portfolio and the religion and belief portfolio have both been working with:

- the College of Policing – to explore discrepancies in examination attainment;
- forces – in an attempt to understand and remove barriers to recruitment; and
- the [Police Superintendents Association of England and Wales](#) – to support its ‘Future Supers’ programme for officers from ethnic minority backgrounds.

NPCC diversity, equality and inclusion strategy 2018–2025

The diversity, equality and inclusion co-ordination committee oversees the [NPCC *diversion, equality and inclusion strategy*](#), which was published in 2018.

The strategy has three main sections (‘our partners’; ‘our organisation’; and ‘our communities’) and provides three toolkits. The toolkits contain practical recommendations for forces to adopt. Although it wasn’t the purpose of this inspection to explore the implementation of the strategy in detail, we found that its adoption within policing was inconsistent.

The strategy and toolkits refer to the nine legally [protected characteristics](#) and [set out chief constables’ responsibilities to consider people](#) who are protected under the Equality Act 2010 and the [public sector equality duty](#) that followed in 2011.

When the strategy was introduced in 2018, the then president of the [National Black Police Association](#) commented:

“...although imperfect as any strategy for 43 police forces and 42 police crime commissioners will be... Race is given a clear priority as promised, which we hope will ensure policing legitimacy, reflect operational necessity, and improve community engagement.”

The strategy didn't include a commitment to a specific and dedicated action plan. Instead, it stated:

“The DEI Co-ordination Committee will not have its own work plan but will have a composite plan that incorporates relevant objectives from the remaining co-ordination committees. Relevant objectives will be agreed by the co-ordination committees' chairs and the purpose of the composite plan will be to enable strategic oversight of relevant work being undertaken that is relevant to DEI and enable signposting of specialist support that will help ensure diversity, equality and inclusion is embedded within all that we do.”

[The National Black Police Association called on the NPCC](#) to develop “a rigorous framework for scrutiny and oversight on race issues”, including “setting standards on chief officer leadership and development of their BAME officers and police staff”.

Progress since 2018

After the launch of the strategy, the NPCC gave forces a framework to self-assess their progress and asked them to report their findings. The College of Policing has also carried out peer reviews of several forces, which have led to it giving advice to those forces on areas for improvement.

But the findings from these assessments and reviews haven't been consistently circulated beyond the forces concerned. Not all our focus group representatives were aware of the work that the College of Policing had done. They told us other forces would have welcomed the opportunity to read the assessments and reviews, to help them make their own improvements.

The strategy was published five years ago, so we were disappointed to find that some of our police interviewees didn't know how forces should use the strategy and the toolkits, or whether this was mandatory or voluntary.

We found that the strategy and its associated toolkits didn't receive widespread support from forces. Senior leaders we spoke to said the strategy needed to be refreshed and re-introduced. We agree.

A new strategy is due to be published in 2025, but increased momentum is needed before then. The NPCC told us that the 2018–2025 strategy, now a joint strategy with the College of Policing, had been refreshed and was ready for circulation to forces. But it hasn't yet been published.

We believe that the publication of this revised strategy is necessary if, in future, the police service is to be able to successfully rebut the criticism about the lack of progress that it currently attracts.

Recommendation 1

As soon as practicable, and no later than 31 March 2024, the [National Police Chiefs' Council](#) lead on diversity, equality and inclusion and the [College of Policing](#) should publish the revised 2018–2025 diversity, equality and inclusion strategy. This revised strategy should address fully the matters raised in [The Macpherson Report: Twenty-two years on](#) and include requirements for:

- forces to self-assess their implementation of the strategy;
- National Police Chiefs' Council reviews of force self-assessments and/or College of Policing peer reviews; and
- sharing organisational learning within the police service from these reviews.

Police Race Action Plan 2022

In 2020, following the murder in the USA of George Floyd by an on-duty police officer, the Black Lives Matter protests took place in the UK. These protests – which occurred halfway through the period covered by the NPCC diversity, equality and inclusion strategy – highlighted the frustration of some communities in their relationship with the police.

In May 2022, the NPCC and the College of Policing published the first version of a *Police Race Action Plan*. The NPCC told us that the plan will evolve through consultation. However, at the time of our review the plan hadn't been finalised and published.

We reviewed the initial version that sets out four ambitions:

- **Not under-protected:** A police service that protects Black people from crime, and seeks justice for Black victims.
- **Not over-policed:** A police service that is fair, respectful and equitable in its actions towards Black people.
- **Involved:** A police service that routinely involves Black people in its governance.
- **Represented:** A police service that is representative of Black people, and supports its Black officers, staff and volunteers.

The plan includes specific commitments to enforcing a zero-tolerance approach to racism in policing, and to adopting an ‘explain or reform’ approach to race disparity. The concept of ‘explain or reform’, first discussed in the 2017 [Lammy review](#), proposes that if a disparity is identified in policy or practice that can’t be explained, the relevant policy or practice should be changed.

The plan’s foreword acknowledges the uncomfortable history of relationships between the police and Black communities. This has included overt racism. The plan states that while much has been done to address racism in the police, change hasn’t been fast or significant enough. Rightly, it apologises for the racism, discrimination and bias that still exist in policing. And it states that much more must be done to achieve the objective of an “anti-racist police service”. We agree.

The plan also sets out a range of actions aimed at achieving these ambitions. These include:

- introducing mandatory training for all police officers and staff about racism, anti-racism, Black history and its connection to policing;
- developing a new approach to tackle race disparities in the use of police powers (such as stop and search, and the use of taser and other types of force) supported by strengthened governance and oversight;
- reviewing misconduct and disciplinary processes to reduce race disparities;
- better enabling Black people to have their voices heard, by seeking out the views of local communities and Black police officers and staff;
- addressing the criminal exploitation of vulnerable young Black men;
- improving the police response to missing persons from Black communities; and
- introducing a national standard for all recruitment and promotion processes.

Difficulties in agreeing the final version of the plan

Some senior police officers and leaders within other organisations told us the pace of work on developing and implementing the plan has been too slow. We agree.

One reason for this slow progress has been a protracted debate between senior police leaders on whether the plan should continue to attribute the term “institutional racism” to the police service, as the Macpherson report had. This disagreement over any justification for its continued attribution appears to have been one of the biggest challenges in developing the plan.

Despite several NPCC board meetings, an extraordinary board meeting, and a Chief Constables’ Council meeting, the debate over “institutional racism” ended without consensus. Some people we spoke to voiced frustration that it had absorbed so much time and ended without resolution.

After our fieldwork for this review was completed, Baroness Casey examined racism in the Metropolitan Police Service as part of her [independent review](#) into the standards of behaviour and internal culture of the force. Baroness Casey's final report was published on 23 March 2023 and found the Metropolitan Police Service remains institutionally racist. More recently, on 25 May 2023, the Chief Constable of Police Scotland accepted the force was institutionally racist at a meeting of the Scottish Police Authority.

In *The Macpherson Report: Twenty-two years on*, the Home Affairs Committee expressed its disappointment in the delay in finalising and publishing the plan, stating:

“The NPCC’s announcement that it is developing and implementing a national race equality action plan is welcome, but it is disappointing that it is taking so long for forces to agree on much needed action.”

The disappointment expressed by the Home Affairs Committee is, in no small part, a consequence of the collective failure by police leaders to make enough progress over the decades since Stephen Lawrence was murdered. Substantial responsibility for achieving the necessary improvements rests with the NPCC. The plan should be finalised and published as soon as practicable.

Governance and accountability

In July 2023, the NPCC appointed a new programme director and senior responsible officer to finally agree and publish the plan.

The implementation and oversight of the plan sit outside the NPCC co-ordination committee structure. They have their own governance arrangements through the plan’s programme board, which reports directly to the NPCC. The plan will receive scrutiny through the independent scrutiny and oversight board.

We are cautiously optimistic about these governance arrangements, but unless and until the NPCC and the College of Policing finalise and publish their plan – and police forces act on it – its value remains in question.

In August 2023, after our inspection, the [Police Race Action Plan Independent Scrutiny and Oversight Board published its annual report](#). In this report, the board makes seven recommendations to make sure the Police Race Action Plan promotes an anti-racist approach in policing. This includes recommending that police forces improve their engagement with external stakeholders.

Recommendation 2

As soon as possible, the [National Police Chiefs’ Council](#) and the [College of Policing](#) should finalise and publish the Police Race Action Plan. Forces should implement this plan, following its publication, without delay.

Anti-racist action plans in Wales

Our inspection included a review of the documentation concerning a cross-system approach to race disparity in Wales.

In 2022, the Welsh Government published its *Anti-racist Wales Action Plan*. This sets out an objective for Wales to be an anti-racist nation. The purpose of the plan is to “collectively, make a measurable difference to the lives of Black, Asian and Minority Ethnic people”.

The plan sets out actions and performance measures that relate to both the public and private sectors, including actions for the criminal justice system.

In September 2022, the *Criminal Justice Anti-Racism Action Plan for Wales* was introduced. The plan, commissioned by the Criminal Justice Board for Wales, contains seven commitments that aim to establish an anti-racist approach across all sectors of the criminal justice system in Wales and is supported by funding from the Welsh Government and criminal justice agencies across Wales.

We haven't assessed the effectiveness of this work, because it is still in its early stages. But its cross-sector approach, coordinated and supported by Government, could provide a helpful model for implementing the Police Race Action Plan.

Police and crime commissioners

One of the roles of a police and crime commissioner is to establish the police and crime objectives for their area using a police and crime plan.

We were told that while some commissioners engaged in extensive discussions with chief officers about race and policing, others weren't doing this.

The APCC's *strategic plan 2022–24* states that 37 of the 43 police and crime plans had priorities on equality, diversion and inclusion. But of the eight police and crime plans we reviewed, only one prioritised race. Some plans mentioned diversity in recruitment, representation, workforce diversity, inclusion and disparity in criminal justice outcomes. Four of the eight plans made no mention of race, diversity, equality or inclusion at all.

When fulfilling their responsibilities, chief constables must have regard to the police and crime plan. It is reasonable to conclude that if race and policing isn't a feature of the commissioner's plan, chief constables may be less inclined to give it the priority it requires.

The Home Affairs Committee report, *The Macpherson Report: Twenty-two years on*, is severely critical of the progress made by the police. And in this inspection report we describe various shortcomings in the implementation of police strategies and plans. We would therefore encourage police and crime commissioners who haven't yet made race and policing a priority to reflect on whether it is now time to do so.

Association of Police and Crime Commissioners

Police and crime commissioners are represented nationally by the APCC, which has an elected chair and board of directors. All police and crime commissioners, and police, fire and crime commissioners, are members of the APCC.

The APCC represents police and crime commissioners in much the same way as the NPCC represents senior police leaders. Within the APCC, various police and crime commissioners oversee national portfolios, some of which include diversity, equality and inclusion matters.

The APCC provides information on national policing policy issues and legislation, and consults with police and crime commissioners to develop relevant policy and influence change.

Since December 2020, the APCC has published a race disparity toolkit approximately every six months. This aims to help support its members to tackle race disparity locally, in part through sharing good ways of working.

The APCC joint leads on race disparity, equality and human rights are involved in the development of the Police Race Action Plan and sit on the plan's programme board.

College of Policing

Despite frustrations about the lack of progress, the NPCC and APCC leaders we interviewed were complimentary about the College's work and emphasised the important role it plays in race and policing.

The Home Affairs Committee report stated:

“The College of Policing has an important role to play in providing training, guidance and standards for police forces to follow. Although it has developed training and guidance on stop and search, it has not played a strong enough role in ensuring that officer training is focused specifically on anti-racism in addition to diversity and unconscious bias. We would like to see recommendations made by the College of Policing taken up consistently across police forces, so that opportunities to improve standards and practices are not lost.”

At the time of our review, there were still no national standards on race or diversity training. This has contributed to significant inconsistencies between forces. For example, we established that some forces advocated [unconscious bias](#) training, while others were opposed to it. In 2021, a [report by the Commission on Race and Ethnic Disparities](#) (summarised in [Annex A](#)) recommended moving away from unconscious bias training.

More encouragingly, the College told us that it is in the process of addressing the absence of national standards. The Police Race Action Plan includes the following commitment:

“The College and the NPCC will develop a mandatory programme that ensures every police officer, member of staff and volunteer is provided with training and education. This will support greater understanding of the national and local history of policing Black communities. It will seek to provide staff with confidence in discussing race and racism, as well as a greater understanding of historical relationships with Black communities, their personal role and the impact of their behaviours, in order to improve trust and confidence within Black communities.”

Recommendation 3

By 31 March 2024, the [College of Policing](#) should establish national standards for police diversity, equality and inclusion training.

The lack of accurate data about race

Background

It is important that Government and police leaders make sure they have the best possible information about how policing services are provided. This includes how people from different ethnic minority backgrounds are treated when they:

- are victims of crime;
- encounter the police as a result of being stopped and searched; and/or
- are suspected of committing an offence.

Under the Equality Act 2010, police forces are bound by the public sector equality duty, which is the duty to have regard to the need to:

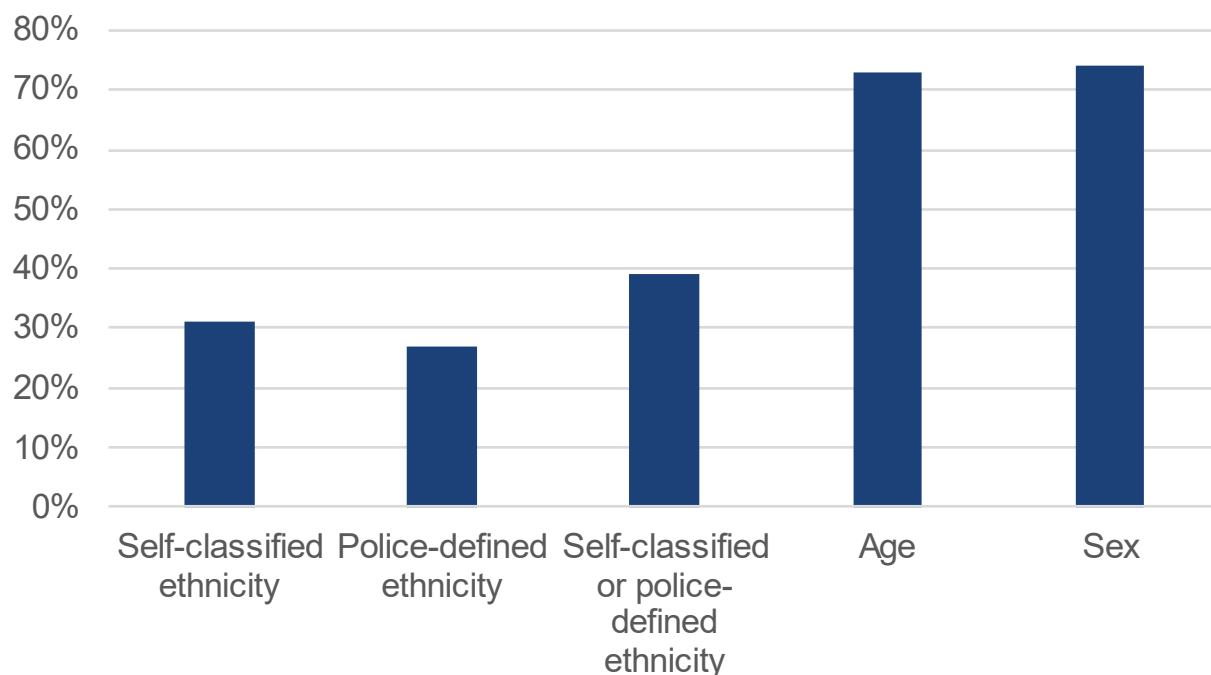
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who have a protected characteristic and those who don't; and
- foster good relations between people who have a protected characteristic and those who don't.

There is no legal duty for the police or other public bodies to show how they comply with the public sector equality duty.

Police data

In this review, we examined how well police forces record and share data (with government and other organisations) about the protected characteristics of the victims, witnesses and suspects they deal with on a daily basis. We have examined data on crimes recorded during 2021–22 where a victim was identified. The figure below shows the results of our analysis.

Figure 1: Proportion of victim-based crime records reported to the Home Office containing victim demographic data in year ending 31 March 2022



Source: Police recorded crime statistics from the Home Office

Note: It isn't mandatory for forces to collect and report ethnicity data to the Home Office.

In 61 percent of all records, the ethnicity of the victim was missing. In addition, 26 percent of records had no stated sex and 27 percent had no stated age. This means forces are unable to accurately assess the full impact of crime, or the quality of their service, on people from different demographic groups. This situation presents a real risk to any plans for improving the service provided by the police to women and girls, and to plans aimed at improving diversity, equality and inclusion more generally.

What we found was worrying. But it is far from a new inspection finding.

The police's failure to record sufficient information about the ethnicity of people they deal with is a persistent and widespread problem across forces in England and Wales. Since 2017, we have published 30 different reports in which we state that the problem exists and explain why it is important that the police take action to address it. We have made ten separate recommendations or identified areas for improvement.

Below, we summarise some of what we have said previously about recording the ethnicity of people who are victims of crime, those involved in stop and search encounters, and people either arrested or subject to other criminal justice decisions.

Victims

In our [2018 hate crime inspection](#), we concluded that forces should be mindful of the implications of not gathering enough information about the people they come into contact with (and hate crime victims in particular).

In one force we visited during that inspection, an audit carried out by the force on racially motivated and religiously motivated hate crime found that the victim's ethnicity was only recorded in 73 percent of cases. In another force we inspected, an analysis of hate crime found that the self-defined ethnicity of the victim was recorded in fewer than 10 percent of all cases over a nine-month period. This force concluded that:

“Failure to accurately record self-defined ethnicity has damaged the constabulary's capability to identify vulnerable victims and disproportionately targeted communities.”

In the inspection report, we concluded that forces don't pay enough attention to gathering information about victims.

In two crime data integrity inspections in 2020, we found that the forces concerned ([Dorset Police](#) and [Northamptonshire Police](#)) should improve the way they collect information about crimes affecting identifiable groups within communities.

In 2020, we published a [report on a super-complaint made by Liberty and Southall Black Sisters](#). We made a recommendation to the Home Office that improvements should be made to the recording of ethnicity because this “will aid transparency with the particular objective of assuring the public that all victims and witnesses are treated fairly and equitably regardless of their protected characteristics”.

In February 2021, in an [inspection report on Cleveland Police](#), we reported that the force was poor at recording the ethnicity of children: in almost half the cases we reviewed, it wasn't recorded. This meant that the force was unable to accurately assess how ethnicity affected risk to children and monitor whether it treated children equitably.

Since 2021, we have published eight National Child Protection reports about separate forces. All of them noted that the forces concerned were failing to effectively record children's ethnicity and other protected characteristics. We concluded that this undermined the forces' understanding of vulnerability and reduced the quality of their approach to it.

In July 2021, we published a joint thematic inspection report (with [His Majesty's Crown Prosecution Service Inspectorate](#)) on the [police and Crown Prosecution Service's response to rape](#). In our case file analysis, we noted that ethnicity wasn't recorded for the victim in 167 of the 502 cases that were reviewed, and for the suspect in 194 of the 502 cases.

In September 2021, in [our police response to violence against women and girls final inspection report](#), we found that all the forces we inspected had large gaps in their data regarding ethnicity. Ethnicity information was missing for a substantial number of crimes in all the forces we visited. The force with the least amount of missing ethnicity information had 35 percent of cases missing this data. And at one force, 50 percent of cases had no self-defined ethnicity information recorded.

In December 2022, we published a [report about an investigation into a super-complaint made by the Tees Valley Inclusion Project](#). The investigation was about how the police respond to victims of sexual abuse when the victim is from an ethnic minority background and may be at risk of honour-based abuse. We found that a lack of robust police data on victims' ethnicity is a fundamental failing. And we were disappointed to find that we couldn't investigate a potential difference in service quality based on ethnicity. This was because there was no reliable data sample to test this premise against.

Most recently, in March 2023, we published an [inspection report on how well the police tackle serious youth violence](#). We found that police in many forces still weren't recording ethnicity data well enough, which was preventing them from understanding the full extent of any racial disparity.

Stop and search

In our [2017 State of Policing report](#), we said that many forces were getting better at monitoring how they use stop and search powers, including regularly examining data on ethnicity and age. But few had all the data they needed to do this effectively.

In June 2021, we published a [spotlight report on stop and search and the use of force](#). We concluded that a failure to record ethnicity data in an increasing proportion of records was hiding the true disproportionality rate. This meant that some forces weren't able to see the full picture of any disparity that might exist. We therefore made this recommendation:

“With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.”

In our [2021 State of Policing report](#), we concluded that the failure by forces to record some ethnicity data might be masking the true stop and search disproportionality rate.

In our [2022 State of Policing report](#), we stated that while the use of stop and search by the police is an essential tool, its impact on individuals and communities needs to be better understood.

People arrested or subject to criminal justice decisions

In our [2018 State of Policing report](#), we said that too few forces are recording information about the ethnicity and other protected characteristics of people they detain.

In our July 2018 hate crime inspection report (discussed above), we concluded that the police don't pay enough attention to gathering ethnicity information about perpetrators.

In August 2019, we carried out an [inspection of custody suites in England and Wales used to detain terrorists](#). In the report, we recommended that:

“Counter Terrorism Policing and forces should work together to ensure that information on the protected characteristics of detainees is gathered accurately and monitored to show fair and equal treatment at force and national level.”

Since 2020, we have published 12 separate force inspection reports about the operation of police custody suites. All of them noted that forces were unable to provide evidence that they were complying with the public sector equality duty. This was because the forces didn't have enough data on the ethnicity of people they detain to show that outcomes were fair.

In December 2020, we published our investigation report into the super-complaint on policing and immigration status made by Liberty and Southall Black Sisters. We made the following recommendation to the Home Office:

“Improve the recording [of] the status, ethnicity and nationality of people referred, or enquired about, to the National Command and Control Unit within Immigration Enforcement in order to understand and record whether the caller believes the individual to be a victim, offender or both.”

In March 2023, in our inspection report about how well the police tackle serious youth violence, we highlighted that police forces were failing to accurately record the ethnicity of offenders.

Finally, alongside this inspection report, we have also published [our inspection report into race disparity in police criminal justice decision-making](#). That report makes recommendations for police forces and other organisations to better record the ethnicity of those people subject to these decisions.

It is deeply regrettable that, despite all the recommendations we have made over many years, the situation hasn't improved.

Because of the extensive evidence of the police's failure to improve its recording of ethnicity, we see little point in making another recommendation in this report that would merely amount to a variation of what we have said many times before.

We have considered recommending that the Home Secretary should impose regulations on the police. The binding effect of these regulations would be to force the police to make the necessary and long-overdue improvements. It is in the Home Secretary's power to make the police take action. But doing so would be complex and challenging. At present, we therefore consider it sensible to view regulation as a last resort.

When we consulted senior police leaders and officials from the Home Office and College of Policing (which also holds regulatory powers), many raised concerns that the necessary improvements would need to involve not just ethnicity data, but all protected characteristics.

Those we consulted told us that the NPCC's diversity, equality and inclusion co-ordination committee is leading a project to develop a new approach for recording and collating data on protected characteristics. The relevant working group includes representatives of the NPCC, the College of Policing, police forces, the CPS, the Ministry of Justice, technology suppliers and crime registrars.

We were told that the diversity, equality and inclusion co-ordination committee has presented this new approach to the Chief Constables' Council and gained the council's approval for its implementation. In the next phase of work, the committee will work with technology suppliers to develop ways for the police to routinely record, retrieve and share this data.

We have also been told that the College of Policing will develop training and guidance to support forces, officers and staff in gathering the necessary data.

At the time of this report's publication, there remains a major question mark over whether this project will lead to the improvements needed, and whether it will do so within a reasonable time frame.

But it would be unfair to prejudge the project's outcome. At this stage, we are prepared to give the police the opportunity to implement this project and add our support to the work, in the form of the following recommendation:

Recommendation 4

By 30 April 2024, the [National Police Chiefs' Council](#) and [College of Policing](#) should jointly implement the technology solutions and training required to make sure forces consistently record and share data on [protected characteristics](#), in particular with regard to race (colour, nationality, and ethnic or national origins).

However, our position is clear: if this project doesn't have the desired positive impact, our recommendation will be for a new regulation that mandates the recording, analysis and sharing of accurate data.

Annex A: Relevant reports and reviews

- HMIC: [*Equal opportunities in the police service*](#), 1992 (19 recommendations)
- HMIC: [*Equal opportunities thematic inspection: Developing diversity in the police service*](#), 1995 (11 recommendations)
- HMIC: *Winning the race – Policing plural communities*, 1997 (20 recommendations and 11 targets)
- HMIC: *Winning the race revisited*, 1999 (6 further recommendations following the 20 from the previous report)
- Sir William Macpherson of Cluny: [*The Stephen Lawrence Inquiry*](#), 1999 (70 recommendations)
- HMIC: [*Winning the race – Embracing diversity*](#), 2001 (a further eight recommendations)
- House of Commons Home Affairs Committee: [*Police Diversity*](#), 2016 (14 recommendations)
- [*The Lammy Review, an independent review into the treatment of, and outcomes for, Black, Asian, and Minority Ethnic individuals in the Criminal Justice System*](#), 2017 (35 recommendations for multiple agencies)
- National Police Chiefs' Council: [*Diversity, Equality and Inclusion Strategy 2018–2025*](#). (3 toolkits for forces, which contain 76 recommendations/actions for policing)
- HMICFRS: [*Disproportionate use of police powers – A spotlight on stop and search and the use of force*](#), 2021 (eight recommendations)
- House of Commons Home Affairs Committee: [*The Macpherson Report: Twenty-two years on*](#), 2021 (102 conclusions and recommendations)
- Commission on Race and Ethnic Disparities: [*The report of the Commission on Race and Ethnic Disparities*](#), 2021 (24 recommendations for the public sector, including recommendations for policing)
- Independent Office for Police Conduct: [*National stop and search learning report*](#), 2022 (18 recommendations)
- National Police Chiefs' Council/College of Policing: [*Police Race Action Plan – Improving policing for Black people*](#) (204 recommendations/actions)

Annex B: External reference group membership

- Association of Police and Crime Commissioners (APCC)
- Black Police Association (BPA)
- College of Policing
- Criminal Justice Alliance
- Faith Matters
- Home Office
- Independent Office for Police Conduct (IOPC)
- National Police Chiefs' Council (NPCC)
- Open Society
- Police Federation
- Police Race Action Plan Board
- University of Sheffield
- Unjust
- Wales Criminal Justice Board

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