

An inspection into activism and impartiality in policing

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Foreword

In September 2023, the then Home Secretary commissioned us to inspect police involvement in politically contested matters. We examined several things: the police's policies, processes and decision-making; how officers are trained; the police's work with external advisory groups; how police deal with non-crime hate incidents; the police's communication with the public; and whether there are any systemic problems that interfere with police impartiality.

We reviewed over 4,000 documents and held interviews and focus groups with over 400 officers, staff and members of other organisations. We examined the records of 120 non-crime hate incidents. We surveyed the police and the public, for which we received over 4,000 responses. And we analysed over 857,000 police social media posts.

This has been one of the most challenging inspections we have carried out. It deals with complex legislation and regulations. It deals with policing's sometimes invidious role in keeping the peace, meeting the needs of individuals or groups who have opposing views and simultaneously upholding everyone's rights. And it involves contentious, emotive issues.

We found three systemic problems. First, there is a near-total absence of any definition, guidance or judicial consideration of impartiality insofar as it relates to policing. Second, legal application of the [Equality Act 2010](#) is now too complicated. Third, the legislation doesn't clearly define the boundary between police operational independence and appropriate external influence or accountability.

Most [chief officers](#) told us that they experience what they believe to be improper pressure or interference from significant political figures. Chief constables and [police and crime commissioners](#) don't always understand the delineation of their roles and responsibilities. Chief constables need more guidance to help them maintain operational independence.

To improve public trust and confidence, it is important for the police to communicate effectively with communities. We found forces sometimes overestimate the effectiveness of their communications using social media and rely too much on this communication channel. And there is a lack of guidance to help forces communicate on contentious issues, including by using visible representations such as badges and lanyards, which officers often wear on their police uniform.

Many interviewees told us they felt demoralised and let down by forces often not doing enough to respond to inaccurate or unfair media coverage when they are the subject of critical reporting and social media comment. Some described political commentary as being overwhelmingly negative and therefore at risk of distorting public opinion. Many officers and staff were disappointed by the absence of commentary on the good work they do every day.

Since 1999, responding to a recommendation in the report of the inquiry into the racist murder of Stephen Lawrence, forces have brought people together into external advisory groups. These groups help inform police decision-making. There is no up-to-date guidance about how advisory groups should work or how they should be formed. And forces use and run these groups in different ways.

The Stephen Lawrence report also recommended police forces record non-crime hate incidents (NCHIs). All forces recognise the important value of this information. But forces haven't consistently applied the guidance concerning how they should deal with NCHIs. They record and attend more of these incidents than they need to.

Police staff networks have existed since the founding of the Christian Police Association in 1883. And staff networks have played an important role in policing's response to concerns about racism, homophobia and misogyny. There is a perception among police officers and staff that some networks are a higher priority in their force than others. Networks can help forces navigate challenging problems. But when networks become involved in politicised or contentious issues, it can have a negative effect on public trust and confidence.

Having reviewed the evidence, we believe that the lack of clarity within the complex legal and regulatory framework that informs the police approach to politicised or contentious issues is damaging public trust and confidence. In this report, we make 22 recommendations. Our recommendations are designed to provide the clarity needed for police forces to be, and appear to be, impartial by:

- clarifying the impartiality duty and operational independence, and updating associated training and guidance;
- reviewing and updating the Equality Act 2010 and associated training and guidance;
- introducing guidance about police attendance and conduct at events;
- improving communication with the public about politicised and contested issues, including using social media and visible representations;
- updating guidance relating to the use of external advisory groups;
- updating policies and reviewing the governance arrangements for non-crime hate incidents; and
- strengthening the governance arrangements for police staff networks.

We were due to publish our report in July 2024, but the announcement of a general election caused us to delay reporting our findings.

Summary

Following several incidents that attracted media attention in a way that appeared to reduce public trust in the police, the then Home Secretary commissioned a report into activism and impartiality in policing.

Most of the incidents the police deal with receive no media attention. But the minority of incidents that get coverage give the public insight into police work. Sometimes, that insight leads to accusations that the police aren't acting impartially.

This report explores how the police deal with politicised or contested matters. We examine whether the police allow politics or activism to unduly influence them.

Public perception of police impartiality has an impact on levels of public trust in policing. Without that trust, police forces can't keep the public safe.

This has been one of the most challenging inspections we have carried out. It deals with complex legislation and regulations. It deals with policing's sometimes invidious role in keeping the peace, meeting the needs of individuals and groups who have opposing views and simultaneously upholding everyone's rights. And it involves contentious and emotive issues.

Systemic issues

All police officers in England and Wales swear allegiance to the Crown through the oath that they take on joining the police service. This includes swearing that they will act with impartiality. The impartiality duty is also set out in police regulations but only within the section covering restrictions on private lives. The obligations on [police staff](#) to be impartial are similar to those of police officers. But there is limited case law or guidance to help officers and staff understand what this duty covers and what isn't covered. The Police Regulations 2003 and relevant guidance need to change to provide greater clarity on the impartiality duty.

We asked police officers and staff whether they act with impartiality. Most police officers and staff told us they believe they do act with impartiality. They understood impartiality in relation to party politics. But there isn't enough guidance for police officers and staff navigating complex and politicised modern issues.

There is no national guidance that describes precisely what the impartiality duty means, or what it does and doesn't cover. Although we have seen that training for chief officers now includes a greater focus on impartiality, it is still not covered well enough in the training given to all police officers and staff.

Since 2018, the [College of Policing](#) has introduced new entry routes and training to degree standard into policing. Higher education establishments, in collaboration with respective forces, now provide much of the initial training for student officers. But there is no independent process to check the quality and consistency of the training student officers receive or the effect on police culture. A comprehensive post-implementation review of this training is needed.

The Equality Act 2010

The legal interpretation of the [Equality Act 2010](#) is complicated and continues to evolve. It is a lengthy piece of legislation which brought together many different pieces of non-discrimination legislation that preceded it by many decades. Under the 2010 Act, police forces have a duty not to discriminate against members of the public or their own personnel.

The 2010 Act only prohibits discrimination in relation to specified [protected characteristics](#). These are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

Belief as a protected characteristic and the legal framework of what constitutes a belief is complicated. The evolving legal case law results in public authorities and police forces constantly adapting to make sure they comply with their [public sector equality duty](#) and maintain accurate equality impact assessments.

Police sometimes make decisions relating to the Equality Act 2010 that attract criticism. This is particularly the case when they interpret sex, gender and gender reassignment in relation to both the public and their workforce. Legislation and national guidance aren't clear enough. Policing urgently needs greater clarity about how the 2010 Act applies in real-world policing contexts if it is to improve the trust and confidence of the public and support its workforce.

It is important that police engage with communities to serve them effectively. But engagement at some public events may make the police appear less impartial, and the actions of individual officers and staff can undermine the best-laid operational plans. Sometimes, officers and staff get things wrong and the resulting images or footage, propelled by modern media formats, can be extremely damaging.

Police forces often deploy officers and staff to keep the public safe and also to participate in community engagement activities. Sometimes, police officers and staff attend events voluntarily, including when off duty, to show support and to build community confidence.

It isn't always easy to assess whether the police are being impartial. It is even harder to judge how effectively forces maintain the appearance of impartiality. There are differing perceptions of what impartiality is across various groups and communities. It is easy to see why some members of the public think police attendance at these events isn't legitimate and that it diverts resources away from a force's core roles.

The absence of national guidance on police participation in community events increases the risk of the police appearing less than impartial. Officers and staff told us they want explicit guidance on attending events relating to contested or politicised matters. But often police forces don't respond quickly enough to emerging contentious issues; nor do they prepare their workforce to respond impartially.

Operational independence, politics and impartiality

The [Policing Protocol Order 2011](#) set out new governance arrangements for policing, including how the component parts of policing governance operate in relation to each other. These include: the Home Secretary; [police and crime commissioners \(PCCs\)](#); mayors; chief constables; police and crime panels; and the London Assembly Police and Crime Committee. While the 2011 Protocol didn't define police operational independence, it did recognise that Parliament and Government didn't want police officers to be open to improper political interference.

The role of PCCs has made policing more political. In 2015, the Committee on Standards in Public Life found that policing was experiencing political interference and stated there was confusion among the public, chief constables and PCCs. It also stated that the absence of a definition of operational independence was problematic.

On 3 July 2023, the [Policing Protocol Order 2023](#) came into force. The 2023 Protocol includes reserved powers that allow the Home Secretary to intervene and direct all parties within the governance arrangements, in exceptional circumstances. This is to prevent or mitigate risk to the public or national security. But that only applies if the Home Secretary is satisfied, on the advice of the Chief Inspector of Constabulary, that not intervening would result in a police force failing, or national security being compromised.

The relationship between PCCs and chief constables involves a delicate balance. Chief constables and PCCs don't always understand the delineation of their roles and responsibilities. The [Police Reform and Social Responsibility Act 2011](#) states that a chief constable must have due regard to the police and crime plan issued by the PCC or mayoral equivalent. It doesn't necessarily mean they must implement it. But some PCCs told us that they hold the chief constable to account for implementing their police and crime plan rather than for the performance of the force.

Senior officers and staff have varying experiences of working with PCCs. Some were clear that local politicians weren't inappropriately influencing policing matters in their force. But others told us that they had recognised attempts to inappropriately influence policing, albeit they had resisted such attempts. The 2023 Protocol doesn't provide any clarity on what is meant by "improper" when considering political interference. In the 11 years since the first PCC elections, there has been limited judicial guidance on the issue of operational independence.

We heard from local police commanders, officers and staff who regularly receive operational tasks from their PCC. Some said the level of intrusion by the PCC affects their ability to carry out their role and to remain impartial in policing their areas.

MPs and councillors sometimes try to influence police activity. These politicians are entitled to ask what officers and staff intend to do because they represent their communities and society in general. In all but the most extreme and unusual of circumstances, MPs and councillors should be very mindful not to publicly criticise, interfere with or otherwise try to influence any decisions in advance of the police implementing them. Examples of such actions by MPs were evident prior to protests planned for Remembrance Day 2023.

Some officers and staff felt that political interference can result in a prioritised policing response. The prioritisation of otherwise low-priority investigations and trying to achieve a quick resolution through political influence were among the examples we heard.

Overt attempts to influence operational policing on a national level challenge police impartiality. Most [chief officers](#) told us that they sometimes experience what they believe to be improper pressure or interference from significant political figures.

Politicians should be cautious when becoming involved in operational decisions. After the event, their potential influence could become public knowledge and affect judicial proceedings. Political influence can have long-lasting and far-reaching consequences. The polarised positions taken by politicians and the public may prevent the police from being seen as impartial.

Senior officers protect their operational independence and they must reject any attempt by political figures at improper influence. The convention of operational independence requires everyone – police and politicians alike – to understand and

respect their roles, and to vigorously maintain the boundaries between their roles. In doing so, they defend and uphold the principle of policing by consent.

Communication with the public

The College of Policing provides guidance to forces about communicating effectively with the public. However, it doesn't include any guidance to forces about how they should communicate in relation to politicised or contested matters. This needs to change.

All 43 Home Office forces have policies or guidance documents about communicating with the public, including by using social media. We found that most officers and staff had a good understanding of these policies. However, these communications policies don't give guidance to the workforce on communicating about contested issues. In a few documents, we saw advice to the workforce about remaining impartial when communicating with the public. This was usually in relation to party politics.

Police communications and stories in the media about the police can quickly go viral and potentially have a negative effect on public perception of the police. Force communications policies need to give clear directions to officers and staff about communicating with the public in relation to contested and political issues and social causes.

We found evidence of effective governance arrangements for communication with the public (notwithstanding the occasional ill-advised comment or mistake made by individual officers or staff).

Officers and staff often use visible representations as a form of communication. These representations can take the form of items such as badges, patches on uniforms, lanyards, flags, signage on police vehicles and digital badges on online profiles.

However, communication using visible representations risks misinterpretation. While one person may see a badge as a sign of support for a particular group or cause, another may see it as a sign that the wearer isn't impartial. We found that views among the public, officers and staff about the benefits of displaying visible representations vary.

We found policies and force directions about whether the workforce can wear or display such visible representations were inconsistent and sometimes unclear. Chief constables need to be careful in their choices of permitted representations. They should also give clear direction to their workforce about wearing and displaying visible representations.

The media has an important role in communicating police messages to the public and in helping the public to hold the police to account. But forces can quickly lose control of the narrative when the media and social media take an interest in an incident.

Many interviewees told us they felt demoralised and let down by forces often not doing enough to respond to the developing narrative when they are the subject of critical reporting and social media comment. Often, forces remain silent to avoid prejudicing ongoing investigations or judicial processes, despite having evidence that could have corrected reported inaccuracies. But forces shouldn't hide behind these restrictions and should respond publicly whenever they can, even if the response may not always achieve the same level of publicity as the original incident. The morale of the workforce may be improved by seeing that the force is attempting to make the position clear.

Social media platforms improve engagement by using automated systems, known as algorithms. These filter and select content based on data the platform has about the user, such as age, location, what they have viewed before, and their search history. Algorithms can also influence public perception of the police in a way that forces can't control.

When we asked officers and staff about communicating with the public, most interviewees focused their answers on communication using social media. But forces may overestimate the effectiveness of their communications using social media and rely too much on this communication channel. We carried out research into the use of one social media platform by police accounts. It showed that the bulk of police social media posts on that platform received very little interaction.

Other external influences can affect public perception of police effectiveness and impartiality. Many of the chief constables we interviewed stated that they have started to communicate less on social media. They cited two reasons for this. The first was the risk of other social media users misrepresenting or distorting police communications to serve their own agenda. The second was automated bots. In the context of social media, these automated programs – many of which are run by hard-to-identify individuals or organisations from outside the UK – mimic humans and post large volumes of content very rapidly. They may have undue influence on public opinion, including opinion about the police. The police need a greater understanding of the influence of bots and other external influences, and how this can fuel community tension.

The Equality Act 2010 and the public sector equality duty

There is consistent evidence that forces comply with the requirements of the Equality Act 2010 when developing policies and processes. Completing equality impact assessments helps forces comply with this legislation. We found that there isn't enough training in some forces for those completing equality impact assessments, and forces don't always complete them consistently or thoroughly enough. So police forces need to improve their processes for equality impact assessments.

Forces don't systematically review all policies and processes relating to the Equality Act 2010. They should keep all policies up to date so that they reflect changes in the law and allow officers and staff to make decisions based on the correct information.

The Equality Act 2010 sets out a number of primary obligations for public authorities, specifically in relation to the nine protected characteristics. We found some examples of forces going beyond these obligations, but with a rationale or justification for doing so. But some external organisations believe forces aren't justified when they go beyond or contravene their equality legislation obligations.

Forces are trying to navigate this complex legal framework. They need to balance the rights of individuals, some who hold diametrically opposite views, and still find a way through the complex area of equality legislation. This applies to their own policies as well as to their work protecting the public. We found that some forces have a policy of placing particular emphasis on those with certain protected characteristics, while others give equal support to officers and staff with different protected characteristics.

Police forces often struggle to recruit and retain candidates from certain minority groups. For employment purposes, the 2010 Act allows positive action, provided it is justified and proportionate. However, some officers and staff confuse positive action with positive discrimination. Where the workforce didn't fully understand the principles of positive action, we found officers and staff who felt frustrated, resentful and disadvantaged. And in some cases, positive action wasn't always welcomed by those it aimed to support.

Learning and development in relation to the Equality Act 2010

Many of the topics covered by the Equality Act 2010 are the subject of emerging case law, which police forces and the College of Policing need to interpret and respond to quickly.

When providing their workforce with training in relation to the Equality Act 2010, some forces use a combination of external organisations and members of local communities to help attendees understand the importance and impact of their interpretation and use of the legislation. Officers and staff told us that this face-to-face training brings diversity learning to life.

Working with external groups or organisations, including those which hold views that others could find challenging, is important. We found that forces continually review the appropriateness of relationships with external training providers and advisors and assess their credibility.

Most forces use the College of Policing's online [hate crime](#) and diversity, equality and inclusion (DEI) material. Many officers and staff are critical of the online learning for DEI training. Some forces have developed their own training material to complement what the College of Policing provides.

Forces make sure all officers receive equality training when they first join, but refresher training on equality is inconsistent and some forces don't give it. Equality learning and development for supervisors is also inconsistent. However, we found that equality-related learning and development for senior officers is more comprehensive and includes a greater focus on DEI.

Advisory groups

Police forces have been using advisory groups for many years. Since 1999, forces have brought together people and organisations to form external advisory groups that discuss policing-related concerns, particularly in communities with low trust in the police. The number and use of external advisory groups has increased since the last guidance was produced in 2015.

Guidance on the role of external advisory groups is outdated and doesn't reflect the increase in the number and use of such groups. Police forces need updated guidance to help them use external advisory groups more consistently and effectively.

Most forces have a police officer lead for external advisory groups at a strategic level. But it is often unclear how forces bring together governance and oversight of the separate groups. The terms of reference for advisory groups are often unclear. This means that some forces are unclear about how they could or should use their external advisory groups.

We also found that there was little guidance to forces about the recruitment and selection of external advisory group members. As a result, this process varies across forces. Some force recruitment processes for external advisory group members require vetting. Other forces take a less intrusive approach as they have found that vetting can be a barrier to recruiting members.

Forces use external advisory groups differently. Not all forces consult these groups when making policies, and the way forces use the groups to scrutinise police powers varies. Many forces use external advisory groups to reassure communities during or after [critical](#) and major incidents. Forces also frequently make good use of these groups before, during and after planned events. During our inspection, we heard many examples of where the engagement with these groups had worked well in relation to such incidents and events. However, some external advisory group members felt that forces didn't use them enough.

External advisory groups aren't always representative of local communities. Forces often struggle to attract people with a variety of lived experience to their advisory groups. Some forces had targeted recruitment towards people with specific protected characteristics or from certain communities. However, retaining members can be difficult.

External advisory groups aren't always independent. Most forces don't review the membership of external advisory groups, and some members have been in post for a long time. A tenure policy for all members would help to make sure that these groups remain independent, representative and effective.

Training of advisory group members is inconsistent. Many forces didn't have an initial training package for either external advisory group members or for police officers and staff who engaged with these groups. Forces should consider what training external advisory groups need, depending on their purpose. Agreed minimum standards of training would reduce confusion and give the group members the confidence to scrutinise and challenge police policies and processes.

External advisory group members often feel undervalued. Some members believed that their forces valued their input, but we heard that others felt undervalued and underused.

Non-crime hate incidents

The origins of non-crime hate incident recording go back to the Stephen Lawrence Inquiry. The inquiry report recommended the use of a universal definition for a racist incident. It also recommended that police record and investigate equally racist incidents that are crimes, and those that are not. The report also suggested the development of codes of practice to provide a comprehensive system of reporting and recording such incidents and crimes.

A case in 2020 led to a change in guidance for how police deal with non-crime hate incidents (NCHIs). In this case, an individual challenged the College of Policing in the High Court regarding its [authorised professional practice \(APP\)](#) on NCHIs.

The High Court judgment from this case was then appealed to the Court of Appeal, which determined that the APP guidance was unlawful and a disproportionate interference with the right to freedom of expression. Following this case, the then Home Secretary issued '[Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data](#)' (the Code). This was supported by the College of Policing, which updated the NCHI APP.

Differences between the NCHI Code of Practice and the Equality Act 2010 can cause confusion. The NCHI Code of Practice contains "particular" characteristics that are included in hate crime legislation. The Equality Act 2010 contains different "protected" characteristics.

There is inconsistency in the way forces have responded to the Code and the NCHI APP. All of the forces inspected had adopted or were in the process of adopting the APP. But there were significant variances in the actions taken by forces, and how effectively they had implemented the changes. This meant that working practices sometimes differed from policies, leading to inconsistencies in how forces dealt with NCHIs.

The recording of hate-related incidents, and the ability to retrieve data, is a significant challenge in some forces. These forces have difficulty in identifying NCHIs on their systems or can't differentiate between an NCHI and a hate crime. This hampers the ability of the force to effectively analyse data and understand the scale and nature of hate-related incidents.

Some forces don't effectively assess reported incidents, resulting in incorrect recording and inefficient deployment of police resources. The initial assessment is a key stage in the response to reported incidents. Call takers may not be best suited to make this complicated assessment. Forces should make sure that only personnel with the relevant knowledge, and sufficient capacity, to make informed decisions assess reported incidents and determine the appropriate response.

Force review processes for NCHIs and hate crimes don't always provide effective scrutiny. Ineffective review processes in some forces meant that they routinely deployed resources, and allocated incidents for investigation, unnecessarily.

A risk-averse approach and a lack of knowledge have led to incorrect recording of NCHIs and hate crimes. Some officers and staff were fearful of being criticised for failing to record a crime and would record a crime without considering if the incident amounted to an NCHI, or if in fact no record was needed.

The College of Policing has provided online training in relation to NCHIs. However, some officers and staff found this training confusing. This is a complex area and some forces have supplemented the online learning with additional material.

Forces can get valuable information and [intelligence](#) from recorded NCHIs. The information and intelligence gained from NCHIs can help identify [vulnerable people](#) and those who are being victimised, or who may need [safeguarding](#). This also enables forces to identify and assess any threats, trends or community tensions.

Under the new Code, there is a higher threshold for recording personal data in relation to NCHIs than other non-crime incidents. Some interviewees believed that the higher threshold was unnecessary and that existing legislation and common law provided suitable restrictions for recording personal data where appropriate.

In accordance with the Code, in some cases NCHI records, or the personal data they contain, should be removed from force systems. Forces view this as challenging and unnecessary.

Staff networks

Police officers aren't employees, they are Crown servants. They don't share the same rights as other employees, and staff associations represent them. Police staff are employees and they can choose whether they wish to have representation by joining a trade union. There are several trade unions that operate in support of police staff. Staff support networks are different to the statutory associations and unions that operate within policing.

Staff networks aren't a new phenomenon. The Christian Police Association was the first to be founded in 1883. Since the racist murder of Stephen Lawrence in April 1993, police forces have sought to actively respond to widespread concerns about racism, homophobia and misogyny, and do better in attracting, recruiting, and retaining officers and staff from diverse backgrounds. Staff networks have an important role in helping forces make these improvements.

There are 11 national networks and more than 200 local networks across forces in England and Wales. The structure, oversight and governance arrangements for these networks aren't consistent, and some operate almost independently from forces or the [National Police Chiefs' Council \(NPCC\)](#). Police officers and staff involved in networks at both a local and national level must be accountable to the same standards of impartiality as every other officer or member of staff. It is the responsibility of the officer's or staff member's home force to maintain oversight of their conduct and behaviour.

Staff network activity, such as offering advice on, or communicating about, government policy, could lead to a perception that they aren't impartial. Staff networks need clearer guidance to mitigate the risk of them appearing to be political. National police networks have an important role in policing, but their role and terms of reference need to be clear and consistent. And they must adhere to the same standards, oversight and transparency as all police officers and staff members.

Networks can help forces navigate challenging incidents. But when networks become involved in politicised or contentious issues, it can have a negative effect on public trust and confidence.

Local networks mirror the valuable work of the national networks. But not all networks receive the same level of support. While the national networks have a direct relevance to and relationship with historical challenges around recruitment and retention, many of the local networks don't.

Forces' rationales and processes for allocating funding to networks is inconsistent. Most of the inspected forces provide a small budget for their networks. We saw a variance in the annual funding forces allocated to networks. Forces need to prioritise their support for networks in line with their recruitment and retention requirements. This will help them maximise the benefits of improved recruitment, retention and progression for those groups where progress has been too slow.

We spoke to many officers and staff involved in different networks and were consistently impressed by their dedication, passion and commitment. However, officers and staff don't always understand how and why force leaders prioritise networks. With a robust rationale and clear communication, a force may justify its position. Without justification, forces risk discriminating against other groups.

Local networks need clear guidance on their role, particularly in relation to politicised or contested issues. Many of those we spoke to recognised that any overt involvement in conventional party politics was unacceptable. It wasn't clear to us that all personnel were alert to, or felt the same responsibility about, involvement in social politics or causes. Officers, staff and networks need clear guidance to help them navigate these complicated topics.

In the forces we inspected, we spoke to many police officers and staff who told us how important networks were in their force. But not all officers and staff value the work of networks. Some of them felt that networks spent too much time on non-policing issues and that some of them were too powerful. Public views on the benefits provided by networks are mixed.

Recommendations

Recommendation 1

By 31 July 2025, the Home Office, Police Staff Council, [College of Policing](#) and [National Police Chiefs' Council](#) should work together to update the Police Regulations 2003, the Police Staff Council's standards of professional behaviour for [police staff](#), and associated guidance so that they:

- set out in clear terms what the impartiality duty means for officers and staff, both on and off duty; and
- provide clear guidance on what the impartiality duty means in relation to contested or politicised causes.

The College of Policing should update the [Code of Ethics](#) and relevant learning and development material accordingly.

Recommendation 2

By 31 March 2025, the [College of Policing](#), working in partnership with other education organisations, should complete a post-implementation review of the education provisions under the police constable entry routes. This review should make sure that the learning provided to new police recruits is appropriate, consistent and impartial.

Recommendation 3

By 31 July 2025, the Government Equalities Office and Equality Hub should review and update the '[Public Sector Equality Duty: guidance for public authorities](#)', and produce further guidance, to provide clarity in relation to the [protected characteristics](#) and how they apply to policing and police powers. This work should include recommendations for legislative amendments to the [Equality Act 2010](#), for the consideration of Parliament.

The [National Police Chiefs' Council](#) and the [College of Policing](#), in consultation with the [Independent Office for Police Conduct](#), should then work together to produce updated national guidance for forces. They should review this guidance annually and make sure it is updated to reflect any changes that result from developing case law.

Recommendation 4

By 31 March 2025, the [National Police Coordination Centre](#) should amend the online reporting form to require forces to provide information about the effectiveness of the policing style adopted in the event or operation and any allegations relating to impartiality. All forces should make sure their post-event learning reviews include evidence of the effectiveness of commanders' strategies in terms of policing style and impartiality. The National Police Coordination Centre should include information about policing style and impartiality in the learning updates they send to forces.

Recommendation 5

By 31 July 2025, the [National Police Chiefs' Council](#) should publish national guidance for forces in relation to officers and staff attending and participating at community events. This should include guidance on:

- the decision about attendance at or absence from the event;
- communication with the public and the workforce about the reasons for attendance at or absence from the event;
- the dress code for those attending;
- the conduct of those attending; and
- whether attendance is on or off duty.

The College of Policing should reflect this guidance within the relevant [authorised professional practice](#).

Recommendation 6

By 31 March 2025, the [National Police Chiefs' Council](#) should add contentious issues to its existing horizon-scanning process. It should co-ordinate consistent policing responses to these issues and national communication to the public.

Recommendation 7

By 31 July 2025, the Home Office, in consultation with the [National Police Chiefs' Council](#) and the [Association of Police and Crime Commissioners](#), should publish guidance for the term “operational independence” within the [Policing Protocol Order 2023](#).

Recommendation 8

By 31 July 2025, the [College of Policing](#) should update its engagement and communication [authorised professional practice](#) to give more up-to-date information about communicating using social media platforms. It should also include guidance about how to communicate about politicised and contested matters. The College of Policing should regularly review the updated guidance to make sure it keeps pace with changes to social media.

Recommendation 9

Within six months of the [College of Policing](#) updating its engagement and communication [authorised professional practice](#), forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

Recommendation 10

By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise. The [National Police Chiefs' Council](#) should support chief constables in achieving a consistent approach.

Recommendation 11

By 31 July 2025, the [National Police Chiefs' Council](#) should carry out or commission research into the influence of bots and non-local social media users, and how this can fuel community tension.

The [College of Policing](#) should include any learning from this research in the revised engagement and communication [authorised professional practice](#).

Recommendation 12

By 31 July 2025, chief constables should make sure that those personnel responsible for completing [equality impact assessments](#) are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

Recommendation 13

By 31 March 2025, all chief constables should audit their policies that include or relate to the [Equality Act 2010](#). They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

Recommendation 14

By 31 March 2025, the [College of Policing](#) should work with forces to evaluate and improve diversity, equality and inclusion training. This should include a consideration of the effectiveness of online training for this type of material. The College of Policing should regularly review and refresh guidance on the [protected characteristic](#) of belief, in line with emerging case law.

Recommendation 15

By 31 March 2025, the [College of Policing](#) should publish new guidance on the role and use of external advisory groups, taking into consideration the results of its research and other relevant work. As a minimum, this should include guidance on:

- terms of reference;
- selection and role of the chair;
- vetting or other appropriate security measures;
- recruitment, selection and tenure of members;
- reward, payment and expenses; and
- training.

Recommendation 16

By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

Recommendation 17

By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to [hate crimes](#) and non-crime hate incidents.

Recommendation 18

By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

Recommendation 19

By 31 July 2025, the [College of Policing](#) should work with forces to evaluate and improve the effectiveness of non-crime hate incident training. This should include consideration of the most effective methods of providing this training.

Recommendation 20

By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from [‘Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data’](#), the force should record the rationale for this.

Recommendation 21

By 31 March 2025, the [National Police Chiefs’ Council](#) should publish a national terms of reference and governance structure for staff networks. The National Police Chiefs’ Council and forces should withdraw funding and resources from any staff network that doesn’t comply with these governance arrangements.

The National Police Chiefs’ Council should also publish guidance to forces to make sure local and national networks operate in a consistent and coherent manner.

Recommendation 22

By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

1. Introduction

Background

The idea of [policing by consent](#) developed by the then Home Secretary, Sir Robert Peel, has endured since 1829 when he set down his nine principles of policing. One of the principles instructs the police:

“To seek and preserve public favour, not by pandering to public opinion; but by constantly demonstrating absolutely impartial service to law, in complete independence of policy, and without regard to the justice or injustice of the substance of individual laws”.

This principle has stood the test of time.

The police deal with millions of incidents each year. In 2023 alone, there were more than 15 million incidents. The vast majority don't feature in any television, newspaper or social media commentary. But the tiny minority that do appear in the media offer the public an insight into how the police work.

Sometimes, that insight leads to accusations that the police don't always demonstrate absolute impartial service to the law, or that on occasions they act with bias.

In this report, we explore how the police deal with politicised and contested matters. We examine whether the police allow politics, activism or impartiality, in several guises, to unduly influence them.

History shows that public trust and confidence in the police to act with impartiality are important. For example, after the policing of the miners' strike in the 1980s, which many view as politically directed, it took decades for some of the communities affected to begin trusting the police again; some still don't fully trust the police to behave impartially.

About us

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services to make communities safer.

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.

Our commission

On 1 September 2023, the then Home Secretary commissioned us under section 54(2B) of the Police Act 1996 to carry out an inspection into the extent to which police involvement in politically contested matters may be having an impact on the effectiveness, efficiency and legitimacy of operational policing, by influencing policing policy, priorities and practice.

Our terms of reference

In our inspection, we addressed the following matters:

- how effectively police policies and processes comply with the obligations set out in the [Equality Act 2010](#) and other related legislation and guidance;
- how such policies affect the police's decision-making and subsequent outcomes;
- the suitability of training provided to staff to implement these policies and processes, as well as the suitability of the organisation(s) that provide this training;
- whether the recording of non-crime hate incidents since changes to police [authorised professional practice](#), following the [2021 Miller case](#), has adversely affected operational decision-making;
- the value to the police of recording non-crime hate incidents;
- how effectively forces select and use advisory groups that influence force policies and processes;
- how effectively forces ensure impartiality when using advisory groups; how effectively they seek to obtain a range of views from groups (including those that may hold opposing views); and how effectively they take account of the views of those unrepresented in advisory groups;
- how effectively forces communicate with the public on matters such as police participation in political or social activities or campaigns, and how this affects public perceptions of the police; and
- whether there are systemic problems that prevent the police from being, or being seen to be, impartial – especially in contentious matters.

Methodology

Our inspection took place between October 2023 and December 2023. We carried out fieldwork in 12 police forces in England and Wales. We carried out:

- a document review, in which we examined 4,093 documents, which included policies, processes and previously published HMICFRS inspection reports;
- a total of 124 interviews with senior police officers and staff in police forces. These included senior officers; leads for equality and [hate crime](#); and representatives from staff associations, unions and support networks;
- a total of 91 focus groups in police forces including supervisors, investigators, neighbourhood and response officers, and members of [independent advisory groups](#);
- a further 63 interviews with [chief officers](#), national police leads and external organisations; and
- [reality testing](#) across each force area by speaking informally with individual police officers and staff.

Case file review

We asked each force to provide ten examples of cases they had recorded as non-crime hate incidents. In total, we reviewed 120 cases. In the review, we examined how forces initially recorded hate-related incidents when they were reported. We then considered how effectively forces assessed and reviewed incidents to allow them to determine their response. Finally, we considered how the incidents had been finalised and the appropriateness of the response.

Call for views from police officers and staff

We carried out a call for views from police officers, staff and volunteers across forces in England and Wales. We sent the link to the call for views through our monthly stakeholder newsletter, and asked for it to be publicised in all forces. We directly asked the statutory staff associations and unions for their support in communicating our call for views to their members. They declined. Some stated that they didn't support the political nature of the commission. Others stated that they didn't have the capacity to support us. The call for views was voluntary and anonymous and covered a range of areas relating to equality in the workplace, including:

- understanding of impartiality;
- force communications with the public;
- staff networks; and
- diversity, equality and inclusion.

The call for views allowed respondents to miss out questions if they wished.

We received 1,766 responses to the call for views, with 1,413 respondents completing it in full.

Public opinion poll

We commissioned Ipsos to carry out a public opinion poll. The poll was available to adults aged between 16 and 75 throughout England and Wales and was open for responses between 15 December 2023 and 18 December 2023. In total, Ipsos received 2,253 responses to the survey. The topics included in the opinion poll were similar to those included in the call for views.

Social media research

We commissioned the London Data Company to analyse over 857,000 posts made on one social media platform (X formerly known as Twitter) from 600 official accounts held by police forces in England and Wales. We asked all forces to give us the names of accounts associated with their force including those for individual members of their workforce (such as chief officers). These details were used to retrieve posts made from these accounts between 1 January 2017 and 28 November 2023.

Explanations

In our inspection, we explored how the police deal with politicised and contested matters. We also looked for evidence of impartiality or actions that gave the appearance of impartiality.

While there is no authoritative definition of the terms “contested” or “politicised”, the commissioning letter explicitly referred to these terms but didn’t define them. So for the purposes of our inspection, we have defined them as follows:

contested – claiming something is wrong or unfair and trying to change it; and

politicised – making something political or the subject of political debate, commentary or policy.

Another term we use frequently throughout this report is “impartiality”, which we define as follows:

impartiality – favouring neither side in a dispute or argument.

We also use the term “training” in relation to police careers. The [College of Policing](#) refers to “learning and development” which includes face-to-face, online and self-taught learning opportunities, as well as the material that supports these courses. In this report, we have adopted the term “training” to cover all aspects of learning and development.

2. Systemic issues

The commission required us to consider whether systemic issues in policing are preventing it from being, or appearing to be, impartial, especially in contentious matters. We found three main issues:

- There is a near-total absence of any definition, guidance or judicial consideration of impartiality insofar as it relates to policing.
- Legal application of the [Equality Act 2010](#) is complicated by case law.
- The legislation doesn't clearly define the boundary between police operational independence and appropriate external influence or accountability.

The impartiality duty

There is limited case law or guidance on the impartiality duty

The concept of police impartiality is set out in the oath officers swear and in the [Police Regulations 2003](#) (the Regulations) and the [Code of Ethics](#).

Every [police officer](#), of whatever rank, holds the office of constable. The office of constable confers independence on its holder, who isn't an employee, but a servant of the Crown.

All police officers in England and Wales swear allegiance to the Crown through the oath that they take on joining the police service:

“I do solemnly and sincerely declare and affirm that I will well and truly serve the King in the office of constable, with fairness, integrity, diligence and impartiality, upholding fundamental human rights and according equal respect to all people; and that I will, to the best of my power, cause the peace to be kept and preserved and prevent all offences against people and property; and that while I continue to hold the said office I will to the best of my skill and knowledge discharge all the duties thereof faithfully according to law.”

The Regulations operate as a set of terms and conditions for the service of police officers. They set out the conditions for officers' appointment, including their various duties.

Schedule 1 of the Regulations sets out “the impartiality duty”. But this is only within the section covering the restrictions on officers’ private lives. The Regulations should go further: impartiality is important in everything police officers and staff do, both on and off duty.

The impartiality duty hasn’t materially changed for more than 50 years: it was written at a time when it mostly related to traditional party politics. The Regulations don’t sufficiently reflect the delicate and complex relationship between police impartiality and public consent. Schedule 1 states:

“A member of a police force shall at all times abstain from any activity which is likely to interfere with the impartial discharge of his duties or which is likely to give rise to the impression amongst members of the public that it may so interfere; and in particular a member of a police force shall not take any active part in politics.”

There is very little case law relating to the application of the impartiality duty. The House of Lords considered police impartiality in the case of *Champion v Chief Constable of Gwent Constabulary* [1990] 1 WLR 1. This case considered whether a constable, who was also a parent governor at a local school, could take part in the recruitment of teachers. The police officer successfully appealed a decision by their chief constable, who had refused the application in order to preserve the impartiality duty. When giving his judgment in the case, Lord Griffiths commented that the object of the impartiality duty was:

“to prevent a police officer doing anything which affects his impartiality or his appearance of impartiality. Impartiality means favouring neither one side nor the other but dealing with people fairly and even-handedly.”

Lord Griffiths also stated:

“This restriction is not intended to protect police officers from the occasional embarrassing decision with which they may be faced during off-duty activities; it is there to ensure both impartiality and the appearance of impartiality. There are in my view great dangers in isolating the police from the community and every encouragement should be given to police officers to play a full part in the life of the community in which they live.”

Obligations on police staff are similar to those of police officers

Unlike police officers, [police staff](#) are employees. The ‘[Police Staff Council handbook](#)’ includes the standards of professional behaviour that set the expectations for police staff. The standards for police staff, like the Regulations, require staff to act with fairness and impartiality. Police staff mustn’t discriminate unlawfully or unfairly. Like police officers, they should never accept any gift or gratuity that could compromise their impartiality. They must use their powers professionally, impartially and with integrity, irrespective of an individual’s status.

Most police officers and staff believe they act with impartiality

In our call for views from officers and staff, 70 percent of respondents felt that regulations assist them in acting with impartiality. The majority of police officers and staff we spoke to in this inspection told us that they understood impartiality, and they recognised it was important. Regardless of their role or rank, officers and staff in our interviews and focus groups told us they understood the importance of remaining impartial when policing public protests, and in relation to party politics. One police officer said of impartiality:

“It’s the grain of everything we do.”

The majority of officers and staff who responded to our call for views believed the police were impartial. A total of 75 percent stated the police were totally or mostly impartial compared with 14 percent who felt the police were partial.

The general public were less satisfied. In our public survey, we asked respondents whether their local police forces acted with impartiality. A total of 38 percent said that they did most or all of the time; 22 percent believed they were impartial some of the time. This compared to 13 percent who felt it was hardly ever or never the case, while 27 percent were unsure.

However, very few interviewees we spoke to recognised that impartiality also involved responding to the evolving complexity of contemporary social politics. Officers and staff in one focus group told us:

“We want to do right, but what is right is challenging to understand with various opinions.”

We were therefore less confident that forces have equipped their workforce to deal with this aspect of impartiality.

There isn’t enough guidance for police officers and staff navigating complex modern issues

Since 2014, the police service has had a [Code of Ethics](#). During our inspection, a previous version was superseded by the refreshed Code of Ethics. It sets out the standards and behaviours expected of all those working in policing. It also gives examples to illustrate these expectations. It states that officers and staff must act with fairness and impartiality. The examples of this include not soliciting or accepting the offer of any gift, gratuity or hospitality that could compromise their impartiality.

The Code of Ethics also requires police officers and staff to treat people impartially. The examples provided for this include:

- showing compassion and empathy;
- treating each person according to their needs;
- proactively opposing discrimination;
- considering the needs of all groups; and
- actively seeking or using opportunities to promote equality and diversity.

It also guides officers and staff on the types of associations they must avoid. It states officers and staff mustn't be members of a group or society, or associate with groups or individuals, which would create an actual or apparent conflict of interest with their police role.

Many officers and staff we interviewed told us that the Code of Ethics helped them to understand the impartiality duty. Most operational plans and policy documents we reviewed referred to the Code of Ethics and often gave general advice to officers and staff about the impartiality duty. However, like the Regulations, the Code of Ethics doesn't recognise the complexity of modern contested or politicised social issues. There is little to guide officers and staff in determining whether a topical issue that has received commentary from a politician is to be regarded as political and therefore relevant to the impartiality duty. Nor does it adequately support officers and staff in making effective decisions in some of the difficult situations they find themselves operating in.

On 24 January 2024, the [College of Policing](#) published revised '[Guidance for ethical and professional behaviour in policing](#)' (to support the Code of Ethics). While this was published after we completed our inspection fieldwork, we acknowledge some of the changes it contains. We reviewed the new guidance and found that the importance of remaining impartial was more prevalent than in the preceding version. For example, the revised guidance contains a greater emphasis on using social media properly and the potential risks of not doing so. However, there is still no definition of the impartiality duty and too little advice on what defines a politicised or contested issue and how the impartiality duty applies to officers and staff.

While extensive consultation took place in developing the 2024 code and guidance, our findings from this inspection have highlighted that officers and staff need further guidance in relation to politicised or contested issues and their responsibilities in this area.

Recommendation 1

By 31 July 2025, the Home Office, Police Staff Council, [College of Policing](#) and [National Police Chiefs' Council](#) should work together to update the Police Regulations 2003, the Police Staff Council's standards of professional behaviour for [police staff](#), and associated guidance so that they:

- set out in clear terms what the impartiality duty means for officers and staff, both on and off duty; and
- provide clear guidance on what the impartiality duty means in relation to contested or politicised causes.

The College of Policing should update the [Code of Ethics](#) and relevant learning and development material accordingly.

The impartiality duty isn't covered well enough in guidance or training material

There is no national guidance that describes precisely what the impartiality duty means or covers, or what it doesn't cover. Nor is the impartiality duty addressed in [the College of Policing's 'Vetting Code of Practice'](#) or [vetting of authorised professional practice \(APP\)](#), particularly in relation to membership of any groups or associations, or in relation to a person's conduct.

The College of Policing sets out the core learning and development for police officers and staff in a national curriculum. Police forces have a responsibility to build on this core learning and make sure their workforce is both competent and capable. The College of Policing curriculum doesn't provide enough guidance on how to respond to the evolving complexity of the Equality Act 2010. None of the learning outcomes we reviewed explicitly mentioned impartiality. We found that some police forces have provided guidance to their officers and staff in connection with the impartiality duty, but guidance of this kind inevitably differs to some degree.

The judgment in the Champion case emphasises the importance of police officers and staff being members of their community and participating fully in it. It isn't the purpose of the duty to exclude them from the everyday lives of that community, but they do need clarity on the boundaries they should operate within.

Chief police officers hold the most senior roles in policing. Arguably, they make some of the most important decisions in relation to impartiality. In addition to any prior learning, [chief officers](#) attend the executive leadership programme (ELP) in preparation for their role. We reviewed the curriculum for the ELP in relation to impartiality and found that, while it isn't explicitly set out as a topic area, it is covered within the modules. The College of Policing told us that the principles of impartiality are covered on the ELP curriculum and it will review the content in light of recommendations in this and other reports.

A [2018 report by the NPCC into the recruitment and retention of chief constables](#) recommended additional training for new chief officers, along with access to independent advice for matters relating to the [Policing Protocol Order 2011](#). It also recommended all new chief constables, on appointment, should be provided with a formal briefing on the legislation and emerging case law relating to the Policing Protocol Order 2011. The ELP now includes training for new chief officers in relation to the [Policing Protocol Order 2023](#). But the recommended additional support for chief constables isn't fully in place.

Given the concerning views we identified in our inspection, and the lack of guidance we describe, we think these recommendations should be completed as a matter of some urgency, with reference to the revised Policing Protocol Order 2023.

Differing learning opportunities are contributing to cultural change and a generation gap in policing

In 2016, the College of Policing initiated a new framework for the training of police officers and staff to keep pace with other public sector organisations so that the workforce receives recognised professional qualifications. From 2018, three new entry routes for police constable roles were introduced as part of the Policing Education and Qualifications Framework (PEQF), which all involved police constable probationers joining with or attaining a qualification in professional policing.

The new PEQF entry routes included the Police Constable Degree Apprenticeship (PCDA), a three-year programme that includes education to a degree standard and practical on-the-job experience. Two shorter routes for those who already held a degree were also introduced, the Degree Holder Entry Programme (DHEP) and the route for holders of a degree in professional policing (PPD). On 1 April 2024, a new entry route, the Police Constable Entry Programme (PCEP), launched. This doesn't require new joiners to hold or acquire a professional policing qualification. The four entry routes available to forces (PCDA, DHEP, PPD holder entry route and PCEP) are known collectively as police constable entry routes (PCERs).

The College of Policing is responsible for identifying the key learning requirements for student officers. It sets these out in the national curriculum for policing. In a substantial shift away from previous recruitment arrangements, for some entry routes, individual forces have a responsibility to collaborate with an independent higher education (HE) provider and design a syllabus that achieves these learning outcomes. The College of Policing requires forces to complete a quality standards assessment (QSA) by providing evidence each year that the HE provider meets core requirements. The intention of this is to create national standardisation.

In 2021, the [CEO of the College of Policing, Andy Marsh, commenting on the new training's role in changing police culture, said in a news release](#): "Policing must recapture the best of what it does and deliver a new culture, fit for the challenges and expectations of Britain today." He was referring to the greater emphasis the training places on ethics and integrity.

There is no independent process to check the quality and consistency of the training student officers receive

The College of Policing told us that it was aware of some concerns within the NPCC about a lack of consistency in training material and the way the various HE providers carry out the training. One NPCC lead we interviewed suggested that within the NPCC there were also concerns about the potential for HE providers to influence new police recruits and encourage some cultural changes that are unintended. They told us their concerns related to the position taken by some HE establishments or their teaching staff on political or social causes. But HE establishments and teaching staff aren't bound by the same impartiality duty as police officers and staff.

In this inspection, we didn't examine in any detail the impact these changes may be having on the culture of policing in relation to activism and impartiality. We did look for reassurance that the syllabus appropriately provided new officers with the information they need and that teaching staff provide it in a balanced and impartial manner. At the time of our inspection, the College of Policing told us it was introducing an additional stage to the QSA process. This will include physical visits to observe the teaching of the various programmes within HE establishments. We think this is an important and necessary development.

The College of Policing told us that it has a working group with NPCC representatives to optimise the learning and development provided through the different routes. Their work to make improvements was delayed when, in 2022, the Home Office requested an additional entry route. It told us that it plans to consolidate the QSA process during 2024 and will carry out a comprehensive post-implementation review of the PCER programmes.

[The College of Policing has carried out surveys](#) to understand the experiences of student officers undertaking these new programmes. A survey in 2021 showed that the majority of new officers who responded were dissatisfied with the training from their HE provider. Only 31 percent of PCDA and 37 percent of DHEP respondents were satisfied with their HE training. These views were in stark contrast to the higher levels of satisfaction students reported in relation to training provided by police forces. In total, 75 percent of PCDA and 79 percent of DHEP respondents were satisfied with training provided by their force. By 2022, a concerning deterioration was evident: only 18 percent of PCDA and 22 percent of DHEP respondents were satisfied with their HE training. One officer stated it felt like a "them and us relationship". This was in relation to academic tutors not having any practical policing experience.

A [BBC research article](#) outlines the cultural change that occurs in many organisations, as new younger staff join and those reaching the end of their service leave. The article states:

"Many young people might also want a company that connects with their values. Gen Z is set to be the most diverse generation yet, in terms of race, LGBTQ views

and more. ‘They will expect more diversity all the way up the organisation,’ Dorsey says [Jason Dorsey, an author and researcher].”

[The Police Uplift Programme has resulted in the largest policing recruitment drive for decades](#). The PCDA route seems to be proving a very attractive option to those aged 18–24. This isn’t surprising, as it provides on-the-job degree training and a salary without the need to pay back any student loan. The College of Policing told us that, since 2018, the proportion of new recruits aged 18–24 taking the PCDA entry route is higher than the proportion who took the previous entry route.

The [Uplift Programme](#) and new entry routes have advanced the pace of this generational change. While it was beyond the scope of this inspection to fully explore its effects, they will be significant. There needs to be a reliable and robust process for ensuring the learning and development opportunities provided to new recruits are appropriate, balanced and impartial. The College of Policing needs to carry out a comprehensive post-implementation review of the changes made to PCERs since 2018.

Recommendation 2

By 31 March 2025, the [College of Policing](#), working in partnership with other education organisations, should complete a post-implementation review of the education provisions under the police constable entry routes. This review should make sure that the learning provided to new police recruits is appropriate, consistent and impartial.

The Equality Act 2010

The legal interpretation of the Equality Act 2010 is complicated and continues to evolve

The [Equality Act 2010](#) (the 2010 Act) is a lengthy piece of legislation which brought together many different pieces of non-discrimination legislation that preceded it by many decades. Under the 2010 Act, police forces have a duty not to discriminate against members of the public or their own personnel.

This means every officer, staff member, contractor and volunteer in a police force must be able to identify and prevent discrimination, and support a diverse workforce.

Discrimination

The 2010 Act defines various forms of discrimination. These include: direct discrimination (section 13); indirect discrimination (section 19); discrimination arising from disability (section 15); the duty to make reasonable adjustments (section 20); [harassment](#) (section 26); and victimisation (section 27). All have specific statutory definitions and a considerable body of case law which explain their application.

Positive action

The positive action measures in sections 158 and 159 of the 2010 Act allow employers to take proportionate action that aims to reduce disadvantage, meet different needs and increase the participation of people from under-represented groups.

Positive discrimination

Positive discrimination in recruitment and promotion exercises can be lawful under section 159 of the 2010 Act. Positive discrimination in these circumstances can only be used if the applicants are equally qualified. In other words, positive discrimination can only be used when candidates all achieve the same standard in a selection process rather than reach a set threshold.

Protected characteristics

The 2010 Act only prohibits discrimination in relation to specified [protected characteristics](#). The 2010 Act defines the following as protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

The 2010 Act defines what is meant by each of the protected characteristics. As is the case with other legislation, the interpretation of the 2010 Act continues to evolve through the rulings and judgments of courts and tribunals. This creates a body of law, known as precedent, that future cases must follow. This has the effect of developing the definitions of protected characteristics that all public bodies must consider.

Belief as a protected characteristic

Some of the definitions of protected characteristics are self-explanatory. But it may be useful to summarise the law as to when a belief will constitute a protected characteristic. The test is broad but as set out in a UK employment discrimination law case ([Grainger plc & others v Nicholson \[2010\] ICR 360, §24 per Burton J](#)):

- “the belief must be genuinely held;
- it must be a belief and not ... an opinion or viewpoint based on the present state of information available;

- it must be a belief as to a weighty and substantial aspect of human life and behaviour;
- it must attain a certain level of cogency, seriousness, cohesion and importance; and
- it must be worthy of respect in a democratic society, be not incompatible with human dignity and not conflict with the fundamental rights of others.”

The changing framework of what constitutes a belief

In 2021, in an employment appeal tribunal ([Forstater v CGD Europe \[2022\] ICR 1](#)), the holding of gender-critical beliefs was accepted to be a protected characteristic. Gender-critical beliefs include the belief that sex is biological and immutable, people can't change their sex, and sex is distinct from gender identity.

An employment tribunal ([Corby v Advisory, Conciliation and Arbitration Service 2023](#)) accepted that opposition to critical race theory can also constitute a protected characteristic, and it is well established that many other viewpoints such as ethical veganism and belief in climate change can, in principle, be protected.

In February 2024, an employment tribunal in Bristol ruled that a philosophical belief in anti-Zionism was also protected.

This growing body of case law often results in the police dealing with people who hold widely diverse, challenging and contradictory beliefs, all of which are protected in law. The police often find themselves stuck in the middle and needing to respect everyone's rights to hold such beliefs, including those which some people may find offensive.

The public sector equality duty

The [public sector equality duty \(PSED\)](#) is set out in section 149 of the 2010 Act.

“A public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

Police forces are subject to the PSED. Its scope goes well beyond the duty imposed by the 2010 Act not to discriminate. However, a failure to comply with the PSED wouldn't automatically constitute a breach of the substantive anti-discrimination provisions of the 2010 Act, unless the failure resulted in some form of discrimination, harassment or victimisation.

The PSED has been the subject of extensive case law, but the main principles that apply are now well established and approved at the highest judicial level. There are several principles attached to the PSED, including that:

- compliance must be achieved before and during the time when a particular policy is being considered;
- it isn't a question of ticking boxes, and organisations must legitimately consider how their activities affect different people;
- it requires continuous review;
- the decision-maker decides how much weight should be given to the various factors informing the decision; and
- it doesn't dictate any particular outcome.

On 18 December 2023, in response to developments in case law, the Government published the ['Public Sector Equality Duty: guidance for public authorities'](#).

In particular, the new guidance is intended to clarify the definition of gender reassignment. It advises public authorities that they shouldn't use concepts such as gender or gender identity when undertaking equality impact assessments. It is unclear whether this advice relates to all protected characteristics or just gender reassignment.

We believe the advice should only relate to such assessments when considering the protected characteristics of sex and gender reassignment, whereby public authorities should use the [statutory definitions](#). However, concepts of gender identity may be relevant, depending on the context, to other protected characteristics, such as belief.

As the new guidance came into force after our fieldwork finished, our assessments of force policies and other evidence is based on the previous guidance.

Equality impact assessments

An equality impact assessment (EIA) is a process all public authorities, including police forces, use to help them to comply with the 2010 Act and the PSED. Completing an EIA helps forces make sure they consider the effects of decisions, strategies, policies, services and functions on people with protected characteristics. The PSED doesn't mandate the completion of an EIA. The absence of an assessment doesn't necessarily represent a failure to comply with the PSED, or a breach of the 2010 Act. But forces need to be able to show that they have followed the principles of the PSED.

Policing needs greater clarity on how to apply the Equality Act 2010 if it is to improve the trust and confidence of the public

The 2010 Act is relevant to a wide range of important policing functions. Therefore, all officers and staff need to be able to accurately interpret and apply it. There are occasions when they need to make important decisions, sometimes very quickly.

This can include deciding whether a crime or recordable incident has taken place, or how to respond to spontaneous protests or public order incidents. It can also apply to intervention by supervisors on behaviours and language. Some senior officers were confused about what protected characteristics they need to consider, and the accurate terminology to adopt. The police service's interpretation of the 2010 Act continues to evolve.

We heard from many senior officers and staff who told us they regularly ask for legal advice to help them make decisions relating to the 2010 Act. Examples included advice on planning for protests, employment law and policy. Legal opinion on these matters may differ and will depend on individual circumstances.

Some of the protected characteristic definitions used in the [College of Policing 'Responding to hate' guidance](#) are different to the complicated framework of protected characteristics within the 2010 Act. We will cover this in more detail in our chapter on non-crime hate incidents (NCHIs). But in particular the [NCHI guidance](#) includes the term "transgender identity", and the College of Policing defines this as:

"a person who is transgender or perceived to be transgender including people who are transsexual, transgender, cross dressers and those who hold a gender recognition certificate under the Gender Recognition Act 2004".

The PSED guidance, which was published in 2023, advises public authorities not to consider gender concepts such as gender-fluid, non-binary, transsexual, transgender, and cross dressers when carrying out impact assessments. It states they (gender concepts) "are not encoded" within the Act. That is legally correct, but only in relation to the protected characteristics of sex and gender reassignment.

We are concerned that the new guidance is open to misinterpretation. It could result in public authorities, including police forces, failing to appropriately consider the impact their decisions may have on other characteristics that aren't explicitly written into the Act. For example, the protected characteristic of "belief" could, depending on the circumstances, include gender concepts. We have seen many examples, which are presented later in this report, where policing bodies or forces have obtained legal advice, given due regard to the 2010 Act and made legally sound decisions that have attracted public criticism.

Police sometimes make decisions relating to the Equality Act 2010 that attract criticism

We didn't find evidence of any force apparently contravening the 2010 Act. But the increasing complexity of the law has resulted in contested beliefs having similar protection and requiring due consideration as other protected characteristics. This can make some members of the public and parts of the police's own workforce question the impartiality of the police. Some of the matters the police have no option but to consider, whether at a national or force level, can present them with major dilemmas.

In the context of their PSED obligations, forces have had to at least consider taking measures such as:

- providing multiple ID cards to officers and staff who hold gender fluidity as a belief-based protected characteristic;
- implementing searching policies that may result in [police personnel](#) carrying out searches of a member of the opposite biological sex (as described in [case study 4](#));
- implementing gender-related custody policies affecting detainees who are placed on constant observations for their own safety; this can include officers and staff of the opposite biological sex observing detainees showering or using toilet facilities; and
- taking decisions involving gender identity that may result in police personnel of different biological sexes using the same toilet or changing facilities.

In each of these examples, the police couldn't just reject the issues out of hand. These examples (which to varying degrees were implemented) represent forces' attempts to navigate issues relating to sex and gender. To some observers, they may appear to contradict common sense. We heard from some external organisations, and officers and staff, who thought they were an unlawful interpretation of the gender reassignment protected characteristic.

After our fieldwork had concluded, [the then Policing Minister, The Rt Hon Chris Philp MP, was quoted in The Telegraph](#) as considering changes to legislation that would specify biological sex, regardless of any Gender Recognition Certificate, as the determinate factor in police searching policy. While we accept that not everyone will agree on the proposed solution, this is the sort of clarity the police need to operate effectively.

Striking the right balance between protecting the rights of those who believe in biological sex and others, who may also see the importance of biological sex, but genuinely believe in other concepts, such as gender identity, is increasingly difficult. But the inescapable fact is that the police must observe the 2010 Act, the PSED and emerging case law. [Speaking in the House of Commons in December 2023, the then Minister for Women and Equalities, The Rt Hon Kemi Badenoch MP](#), described the complexities:

“The law is no longer clear. In fact, I would go so far as to say that the law is now a mess because of changing times.”

The police and some other services have coercive powers such as searching, detaining in custody, and using reasonable force on members of the public. As a result, they have a particularly high need for precision and a great degree of clarity and understanding of protected characteristics. This is particularly the case when they interpret sex, gender and gender reassignment in relation to both the public and their workforce. But legislation and national guidance don't yet provide this.

Arguably, there is less clarity than ever. Policing urgently needs greater clarity about how the 2010 Act applies in real-world policing contexts if it is to improve the trust and confidence of the public and support its workforce.

Recommendation 3

By 31 July 2025, the Government Equalities Office and Equality Hub should review and update the '[Public Sector Equality Duty: guidance for public authorities](#)', and produce further guidance, to provide clarity in relation to the [protected characteristics](#) and how they apply to policing and police powers. This work should include recommendations for legislative amendments to the [Equality Act 2010](#), for the consideration of Parliament.

The [National Police Chiefs' Council](#) and the [College of Policing](#), in consultation with the [Independent Office for Police Conduct](#), should then work together to produce updated national guidance for forces. They should review this guidance annually and make sure it is updated to reflect any changes that result from developing case law.

Engagement at public events

Engagement at some public events may make the police appear less impartial

It is important that police engage with communities to serve them effectively. Every chief constable we interviewed made it clear that community engagement was at the heart of everything their forces did. Many officers and staff agreed with them. All forces we inspected showed they had a good understanding of the diverse nature of their communities. Generally, they tailored their policies, services, support, engagement and recruitment accordingly. One interviewee told us:

“Being impartial does not mean we don't talk to people we don't like. We must talk with and seek out differing views. We acknowledge people have different views. We police fairly and impartially. If anyone wishes to voice an opinion, they can if they don't commit an offence.”

Again, the public's perceptions were less favourable than the police's. In our public survey, we asked respondents how effective engaging and seeking the views of all communities were in helping the police to improve services. In total, 44 percent of respondents said this was very or fairly effective, compared to 27 percent who said it was not very effective, and 29 percent were unsure. We also sought their views on whether their force was good at community engagement, and 40 percent said they were effective compared to 40 percent who said they were not. The remaining 20 percent didn't know.

In a focus group of officers and staff, we heard:

“How are we supposed to break down barriers between parts of the community if we cannot engage with the community?”

Throughout this inspection we saw evidence that highlights the volume and diversity of the events, celebrations and protests that police forces play an important role in. This includes maintaining the King’s peace and keeping people safe, as well as building trust and confidence through effective and meaningful engagement.

We heard from many officers and staff who told us that the police need to work hard to overcome historic and deep-rooted concerns about issues such as racism, misogyny and homophobia. We agree with them. However, forces must be careful not to blur the lines between effective engagement and policing without fear or favour.

In our document review, we assessed the planning considerations for public events. Most forces we inspected categorise the officers and staff involved in three distinct groups:

- officers and staff deployed to maintain public safety at events;
- officers and staff deployed to participate in community engagement activities; and
- officers and staff who attend events voluntarily (on or off duty) to show their personal support.

Police officers and staff deployed to maintain public safety at events

Officers and staff deployed to keep the public safe at an event usually attend in uniform with full protective equipment including high-visibility jackets. Event commanders will make decisions on the dress code and other matters and set them out in operational plans and policy documents.

The operational plans we reviewed often included information for officers and staff about the “policing style”, or guidance on engaging with participants. We were pleased to see a number of these plans that offered clear direction on what was acceptable, what was not, and how to remain impartial. Generally, we saw clear and appropriate consideration of the impartiality duty in the operational orders, briefing plans and policy documents we reviewed for contentious events. We found numerous examples of forces setting the standards for officer and staff conduct.

For example, we reviewed a Northumbria Police operational plan that described a policing style that facilitated effective partnership working and positively promoted the community nature of the event. The briefing element instructed officers to:

- act professionally and with integrity, showing neither fear nor favour in what they did;
- use discretion, professional judgment and common sense to achieve the aim of the operation and uphold the law fairly; and

- always remain accountable for individual actions and decisions.

In the Metropolitan Police Service, we saw evidence of an operational plan in relation to protests surrounding the Middle East conflict. The gold public order strategy included an explicit reference to impartiality. The strategy highlighted the sensitivities surrounding the situation and the force's strategic intent to remain impartial during its operational response.

Dyfed-Powys Police sought to maintain impartiality through its Operation Cambrian engagement strategy. This related to protests following the planned housing of asylum seekers in a hotel in Llanelli. The engagement strategy included: "To make clear our status as an impartial body outlining our roles and responsibilities, for example, the prevention of crime and disorder."

The actions of individual officers and staff can undermine operational plans

Despite the efforts we saw forces making to maintain impartiality, they rely on the actions of individual officers and staff members deployed at events. Sometimes they get things wrong, and the resulting images or footage, propelled by modern media formats, can be extremely damaging. The officers and staff charged with preparing these important plans need to make sure they effectively brief and debrief all personnel in relation to the impartiality duty.

However, preparing these plans isn't without its difficulties. We heard from the College of Policing about feedback it had received from public order commanders about the challenges relating to the perception of being impartial. The College of Policing also told us that potential candidates for public order command roles were reluctant to pursue this career path because of the contentious issues and decision-making the role involved.

Some plans we reviewed did include post-event learning reviews, but not all. This means that forces aren't always able to identify whether they were successful in achieving a particular policing style and that the participants' perception was one of impartiality. Their policies may not then reflect the evolving best practice learning for future events or operations. This isn't a new finding. [In our 2021 report, 'Getting the balance right? An inspection of how effectively the police deal with protests'](#), we recommended improved reporting on this subject. The National Police Coordination Centre has implemented an online reporting process for police commanders to complete within 48 hours of an operation or protest. This form doesn't include any reference to the effectiveness of the policing style adopted or whether allegations were made about police impartiality.

Recommendation 4

By 31 March 2025, the [National Police Coordination Centre](#) should amend the online reporting form to require forces to provide information about the effectiveness of the policing style adopted in the event or operation and any allegations relating to impartiality. All forces should make sure their post-event learning reviews include evidence of the effectiveness of commanders' strategies in terms of policing style and impartiality. The National Police Coordination Centre should include information about policing style and impartiality in the learning updates they send to forces.

Police officers and staff deployed to participate in community engagement activities

Sometimes forces deploy officers and staff to participate in community engagement activities. They may also deploy them to represent a particular staff support network or association at such an activity. At some events, forces set out recruitment stalls to encourage interest from under-represented groups. We asked the public whether this type of activity was important in attracting diversity into policing. Of those who responded, 41 percent agreed compared to 26 percent who did not, while 33 percent didn't know.

In our interviews and focus groups, we heard how important and successful this approach was. For example, Sussex Police had carried out research with its new police officer recruits. It heard that some of them only felt confident enough to join the force because they had seen officers involved in a Pride event.

Most of this type of engagement happens with no coverage in the media. However, on occasions, police participation at events attracts particular public criticism. This happens even though the police approach to these events is often similar to those that don't attract such attention. These events that attract the most criticism can influence wider public perceptions about police impartiality.

Officers and staff in most forces told us they understood the benefits of communicating and engaging with the public in this way. One officer said:

“We don't just do it for the craic. Attending something like the county show will add value to what we are doing.”

Police personnel attend many other community events such as West Indian carnivals, Diwali, Hanukkah, Eid al-Fitr, country fairs, Pride, Easter and Christmas celebrations, and Remembrance events. And they also engage with many different communities to build good relationships. Forces need to be proactive and clear in their communications with the public about why they are attending such events.

Police officers and staff who attend events voluntarily

The third, and most contentious, group are those officers and staff who attend events voluntarily to show their personal support. In many of the forces we inspected, senior leaders welcomed and encouraged their officers and staff to participate in such events. But there was inconsistency in whether officers and staff attended in duty time or whether forces allow them to claim their time back.

The majority of chief constables we interviewed told us that any officers and staff attending in a personal capacity to participate in an event do so in their own time. They also said that those attending voluntarily should wear either police uniform, but without protective equipment, or police-branded T-shirts if appropriate. Forces use these dress codes in an attempt to communicate to the public that the officers and staff aren't on duty and aren't an abstraction from the police service at that time. While this may be clear to police officers and staff, we don't think this is clear enough for the public.

Generally, we found inconsistency in the guidance forces give their workforce about attendance and dress at such events. We also found inconsistency in how the workforce followed any guidance. Unsurprisingly, many personnel told us they were confused.

Forces' engagement in some events can have the appearance of bias

This commission asked us to consider whether public displays of support for certain causes was legitimate police activity or political "virtue signalling". Most senior officers we interviewed told us that Pride events were an important engagement opportunity. They said that police participation at such events builds trust and repairs damaged relationships with local communities and within their workforce. And it shows policing as a career choice that members of all communities can have trust and confidence in. Some of the chief constables acknowledged that they would like to adopt a similar approach to other large community events. But they needed to build relationships before the organising groups would welcome them.

Most forces recognised that participation in Pride was more visible than some other events. They told us that they had supported local Pride events with the approval of the respective event organisers. Some chief officers we interviewed told us that their force didn't always receive invitations to participate in some events that they would like to support. Some chief officers told us they thought Pride events weren't to be characterised as political. But others recognised a growing political element. The majority went on to categorically say that they wouldn't support their force being involved in events if there was a clear risk of the event being or becoming overtly political. We agree with this approach.

Most of the external organisations, police officers and staff we spoke to described Pride marches and events as a celebration. However, there were some officers and staff in our focus groups who questioned whether the amount of support for some protected characteristic groups was proportionate. These views varied depending on the force area, but generally included a perception of increased emphasis on race, sex or LGBTQ+. Others were quick to remind us of the importance of overt supportive activity, such as wearing a pin or badge, as well as taking part in processions or community celebrations. Officers and staff told us this was particularly important for those from communities with less-visible protected characteristics. Where forces placed greater emphasis on engagement with some communities, it was often intentional and justified, but it wasn't always understood by the officers and staff we spoke to.

Some forces use external advisors and subject matter experts

We found that some forces used external advisors when reviewing incidents, when developing operational plans, and when reviewing policies. Other forces bring together external subject matter experts, for example in human rights, social care or data science, to advise on force projects. Many forces secure professional advice on complicated human rights considerations when planning for significant protests, marches and events. Forces often convene these expert advisors and reference groups as and when needed, rather than keeping them as standing panels.

Many of the chief constables interviewed in this inspection have distanced their forces from some of the external advisors or organisations they had previously worked with. Generally, this was because they recognised when an individual or organisation may be actively lobbying politicians on specific causes or behaving in a way that is incompatible with police ethics and values.

The absence of national guidance for police participation in community events increases the risk of the police appearing less than impartial

It is easy to see why some members of the public think the police attending these events is illegitimate and that they divert resources away from a force's core roles. In our public survey we asked respondents for their views on whether the police get the balance right between engaging with all communities and maintaining law and order. A total of 37 percent of respondents agreed the police got this balance right, 24 percent didn't, while 26 percent neither agreed nor disagreed, and 13 percent were unsure. Police forces need to apply consistent decision-making and clear public communication to avoid reputational damage.

Whether police attendance in any capacity at an event is appropriate and proportionate will differ from force to force. Those decisions are for the respective force senior leaders to make carefully. They should carefully consider the impression their attendance, or absence, along with uniform dress and behaviour will have on public perception.

In those forces where it is appropriate to take a more active role in an event, there should be a consistent approach to the wearing of uniform. Forces should make it clear to the public whether or not their officers and staff are on duty and whether they have been taken away from responding to calls and keeping the public safe.

Recommendation 5

By 31 July 2025, the [National Police Chiefs' Council](#) should publish national guidance for forces in relation to officers and staff attending and participating at community events. This should include guidance on:

- the decision about attendance at or absence from the event;
- communication with the public and the workforce about the reasons for attendance at or absence from the event;
- the dress code for those attending;
- the conduct of those attending; and
- whether attendance is on or off duty.

The College of Policing should reflect this guidance within the relevant [authorised professional practice](#).

Officers and staff want explicit guidance on sensitive issues

We saw some forces had issued guidance to officers and staff on sensitive and potentially controversial issues such as “taking the knee”, dancing or the wearing of visible signs of support. But too many forces hadn’t. Many officers and staff were critical of their leaders and said they hadn’t received enough clear guidance on what to do or say. In our call for views we asked whether respondents had ever been asked to do something by their force to demonstrate impartiality in controversial circumstances: 81 percent said they hadn’t.

In other forces, we saw policies and operational plans for the policing of contentious issues that didn’t explicitly refer to impartiality. Most did refer to the Code of Ethics. This isn’t a new finding. In our report ‘Getting the balance right? An inspection of how effectively the police deal with protests’, we found a difference in emphasis between gold strategies and silver plans. For example, in one force, the gold strategy for a Black Lives Matter protest referred to “acting without fear or favour”, while the silver tactical plan referred to “standing in solidarity with the public against racism and hate”. Although both approaches were well intentioned, the silver plan lacked impartiality and might have confused officers about their role.

Case study 1

During the fieldwork stage of this inspection, the impartiality of the policing response to protests and demonstrations linked to the Israeli and Palestinian conflict quickly became the topic of widespread debate in forces, the media and politics. The [National Police Chiefs' Council](#) very quickly issued forces with guidance. We were pleased to see the importance of police impartiality set out within that guidance. Officers and staff from different forces told us how helpful they had found this.

Interviewees in one force told us their force had gone further to maintain its impartiality. They told us that the force had instructed officers and staff in uniform temporarily not to attend certain high-street vendors while on duty. They said that the force believed the police could be seen as endorsing vendors with known affiliations to either the Israeli or Palestinian cause.

Forces find it difficult to maintain the appearance of impartiality

It isn't always easy to assess whether the police are being impartial. It is even harder to judge how effectively forces maintain the appearance of impartiality. There are differing perceptions of what impartiality is across various groups and communities.

The media image of a police officer posing with a young supporter at a football match might appear to many to be a good example of community engagement. But the supporters of the opposing football team may not see things that way, particularly if events have led to officers using force on them. But that doesn't mean it was wrong of the officer to pose with the fan, or that they were biased.

As much as police forces have a responsibility to appear impartial, the media and any members of the public who share information are also responsible for reporting honestly and in good faith. We will consider this in more detail in our chapter on communicating with the public.

Police forces don't respond quickly enough to emerging contentious issues, or prepare officers and staff to respond impartially

One chief constable we interviewed didn't believe that there were systemic problems preventing police from being impartial. But they acknowledged that this is extremely complicated. They suggested policing needs a national horizon-scanning function to identify emerging contentious issues, develop [risk assessments](#) and agree a consistent national position. They said the NPCC should then co-ordinate communication to the public, explaining what the police are doing and the reasons why. In some of our focus groups, officers and staff shared this view, and we agree that it would be advantageous.

Recommendation 6

By 31 March 2025, the [National Police Chiefs' Council](#) should add contentious issues to its existing horizon-scanning process. It should co-ordinate consistent policing responses to these issues and national communication to the public.

Operational independence, politics and impartiality

The Policing Protocol Order 2011 set out the new governance arrangements for policing

Creation of the [Policing Protocol Order 2011](#) (the 2011 Protocol) coincided with the first cohort of elected [police and crime commissioners \(PCCs\)](#) taking up their roles. The 2011 Protocol set out how the component parts of policing governance operate in relation to each other. These included:

- PCCs;
- the Mayor's Office for Policing and Crime (MOPAC);
- chief constables;
- police and crime panels; and
- the London Assembly Police and Crime Committee.

The 2011 Protocol also outlined the role and responsibilities of the Home Secretary in relation to policing.

The 2011 Protocol made it clear that:

“The concept of operational independence is not defined in statute, and ... by its nature it is fluid and context driven.”

It also states:

“It is the will of Parliament and Government that the office of constable shall not be open to improper political interference.”

The role of police and crime commissioner has made policing more political

Shortly after the PCC role was created, the then Chief Inspector of Constabulary, Sir Thomas Winsor raised concerns about interference, in a 2013 keynote speech, '[Operational independence and the new accountability of policing](#)':

“The new model of democratic accountability of the police, in the shape of police and crime commissioners, has the capacity to be a very great success, provided everyone in the system has a full and proper appreciation of its checks and balances, and the limits of power, and respects those fundamental and essential characteristics. It is not in the public interest for that appreciation and

respect to be less than complete. There is a clear and present danger that just such a situation may have begun to be established.”

In 2015, the Committee on Standards in Public Life reported on the impact of PCCs in [its report ‘Tone from the top’](#). The committee referred to evidence highlighting the potential for actual or perceived interference by the PCC in the operational independence of the chief constable. It concluded that there was confusion among the public, chief constables and PCCs about respective roles and responsibilities, particularly around operational independence. In its report, the committee identified that the lack of an explicit definition of operational independence was problematic. The NPCC reflected on these findings in [its 2018 report ‘Chief constable preparation, selection, tenure and retirement in the “New Landscape of Policing”](#)’.

In June 2018, the NPCC carried out research into the experiences of serving and retired chief constables. Many of those it spoke to reported positive working relationships with their PCC, but that this was largely dependent on personality. They described it as “a four-yearly lottery for forces”. Many retired chiefs reported an increase in politics within their police forces since the introduction of PCCs. PCCs involved in this research confirmed this was an accurate assessment, and one stated: “Chief constables have got some difficulties in navigating the political landscape.” Examples within this report include:

- One ex-chief constable said of their PCC: “He wanted to do dreadful things go [sic] to the force’s budget that would not have made it sustainable just so he could get re-elected.”
- An interviewee described being pressurised by their PCC to allocate more police officers to an area within the force that included the PCC’s political supporters.
- PCCs directed chief constables not to comment on certain issues.
- One chief constable felt their force should amalgamate with a neighbouring force but they were “forbidden by [their] PCC from articulating this position”.

A review of the Policing Protocol Order 2011 aimed to introduce greater political influence on policing

In July 2020, the Government started a two-part review of the 2011 Protocol. The review considered the roles and responsibilities within the legislative framework. It clarified and sought to improve on some of the governance arrangements, particularly related to giving stronger powers to PCCs and mayoral equivalents. Some of those involved in the consultation process wanted additional clarity on the boundaries of operational independence and the delineation of roles and responsibilities. Within the literature review, the then Government considered the 2015 ‘Tone from the top’ report and 2018 NPCC research report, in part to try and understand why it was getting harder to recruit and retain chief constables.

The 2011 Protocol has been replaced by the [Policing Protocol Order 2023](#) (the 2023 Protocol). A draft version of the 2023 Protocol proposed clarification in relation to powers for the Home Secretary to hold forces to account and intervene directly. The Home Office consulted on these proposed changes with key stakeholders, including chief constables, PCCs and mayoral equivalents. We have reviewed the [published consultation responses](#) and found that the majority of those responding disagreed with the proposed wording to clarify these powers. When the 2023 Protocol was published, most of them had been removed or reworded in the section on reserved powers.

The Policing Protocol Order 2023

On 3 July 2023, the 2023 Protocol came into force. In making the Order, the Secretary of State uses powers set out within the [Police Reform and Social Responsibility Act 2011](#). The governance framework can be summarised as follows:

- The Home Secretary sets the [Strategic Policing Requirement](#) for all Home Office forces.
- The PCC or mayoral equivalent sets the strategic objectives for their force in the police and crime plan and holds the chief constable to account for force performance.
- The Police and Crime Panel provides “checks and balances” on the performance of the PCC or mayoral equivalent.
- The PCC or mayoral equivalent appoints the chief constable, except for the Metropolitan Police Service where the King appoints the Commissioner on the recommendation of the Home Secretary.
- The PCC has the power to remove a chief constable (subject to following a specified legal process).
- The PCC or mayoral equivalent “must not fetter the operational independence of the police force and the chief constable who leads it”.
- The chief constable is responsible for supporting the PCC or mayoral equivalent “in the delivery of the strategy and objectives set out in the Plan”.

The 2023 Protocol also sets out the role of the Home Secretary. The Home Secretary:

- is responsible to Parliament for cutting crime, safeguarding the public, and protecting national borders and security; and
- has reserved powers that allow for an intervention and direction to all the other parties specified in the 2023 Protocol, in exceptional circumstances. This is to prevent or mitigate risk to the public or national security.

These powers don't allow the Home Secretary to interfere with the democratic mandate of the PCC, the office of constable or the operational independence of the police generally. Unless, that is, the Home Secretary is satisfied, on the advice of the Chief Inspector of Constabulary that not intervening would result in a police force

failing, or national security being compromised. Later in this chapter, we consider the relevance of this caveat when we examine the policing of protest.

The relationship between PCCs and chief constables involves a delicate balance

[An article in the House of Lords Library](#) describes PCCs and mayoral equivalents as directly elected political figures, and the 2023 Protocol reinforces that position by stating that mayoral equivalents must appoint a deputy of the same political party. The then Government indicated [its intention to bring forward legislation](#) mandating that all PCCs do the same. All PCCs swear an oath of office, which includes a promise to perform the role with impartiality. After the [2012 PCC elections](#), there were 12 independent PCCs; [in the 2016 elections](#), this was reduced to just three. [At the time of our inspection](#), all 43 PCCs or mayoral equivalents in England and Wales were affiliated with a political party. All but one of these were either Labour or Conservative.

The 2023 Protocol doesn't provide any additional information or clarity on what is meant by the term "improper" when considering political interference. It only refers to the common law legal authority relating to the office of constable, so the clarity provided in [R v Commissioner of Police of the Metropolis ex parte Blackburn \[1968\] 2 QB 118](#) at pp135–136 is of great importance. Lord Denning explained of the office of constable:

"But in all things he is not the servant of anyone, save of the law itself. No minister of the Crown can tell him that he must, or must not, keep observation on this place or that, or that he must or must not, prosecute this man or that one. Nor can any police authority tell him so. The responsibility for law enforcement lies on him. He is answerable to the law and to the law alone."

In the 11 years since the first PCC elections, there has been limited judicial guidance on the issue of operational independence. The [Divisional Court in R \(Crompton\) v South Yorkshire PCC \[2017\] EWHC 1349](#) (Admin) stated:

"The 2011 Act seeks to achieve two, sometimes conflicting, objectives. First, it seeks to maintain proper operational independence for Chief Constables. Second it seeks to achieve proper democratic oversight of the conduct of Chief Constables, for which purpose the electoral mandate of PCCs to hold the police to account is given statutory expression. There will inevitably be tension between these two imperatives in practice. But the [2011] Protocol provides a mechanism by which these tensions are to be managed."

The difference between the roles and responsibilities of chief constables and PCCs is relatively simple. It remains consistent with the precedent set by Lord Denning: the chief constable takes the policing decisions, and the PCC holds them to account for those decisions after the event, rather than trying to direct the outcome in advance. After the event, politicians should find it easier to be more vocally critical or supportive – that is a core aspect of holding the police to account on behalf of the public.

Ultimately, the PCC or mayoral equivalent has the power to remove a chief constable, including for their operational decision-making if they believe that it has undermined confidence in policing. The 2023 Protocol emphasises the fact that PCCs or mayoral equivalents are “responsible for the totality of policing in their area”.

Chief constables and PCCs don’t always understand the delineation of their roles and responsibilities

The [Police Reform and Social Responsibility Act 2011](#) states:

“The chief constable ... must ... have regard to the police and crime plan issued by the police and crime commissioner for that police area.”

The term “have regard” has a specific legal meaning. It means to give a fair consideration to and give sufficient attention to all of the facts. In the context of the relationship between chief constables and PCCs, it doesn’t mean that a chief constable must implement the PCC’s police and crime plan. This important legal point concerning the chief constable’s obligations to the PCC allows the chief constable to make decisions based on the needs of operational policing. These needs may vary from a PCC’s police and crime plan where there is a good reason to do so.

While chief constables’ and PCCs’ priorities tend to be aligned, this isn’t always the case. Where priorities aren’t aligned, the PCC should hold the chief constable to account for the extent to which they “have [had] regard to the police and crime plan”. The PCC shouldn’t consider the extent to which the chief constable has adhered to the plan.

Some of the PCCs we consulted described how they work with their chief constable to develop priorities. Many of the chief constables told us that they considered their PCC’s police and crime plan when developing their own “policing plan”.

The 2023 Protocol (and its 2011 predecessor) makes clear that the chief constable is responsible for “supporting the PCC in the delivery of ... the [police and crime plan]”. This is how the system is designed to work, with the PCC holding the chief constable to account for “the performance of the force’s officers and staff”. In our view, this aspect of the PCC’s role isn’t simply about the delivery of the PCC’s police and crime plan.

However, we heard that there are some PCCs who go beyond the scope of their role. It isn’t clear whether this is accidental misinterpretation of the 2023 Protocol, or intentional. Some PCCs told us that they hold the chief constable to account for implementing their police and crime plan rather than the performance of the force.

When describing operational independence, one PCC told us it was their role to decide what the force does based on the views of the public that elected them, and the chief constable decides how to do it. This PCC was firmly – but mistakenly – of the view that their role was to hold the chief constable to account for implementing the PCC’s plan.

Senior officers and staff have varying experiences of working with PCCs

The Chief Police Officers' Staff Association (CPOSA) is the body that represents chief police officers and staff. Representatives from CPOSA raised concerns with us that neither PCCs nor chief officers fully understand, or consistently apply, the principles embedded in the 2011 and 2023 Protocols. They believe that too many PCCs see the chief constable as their employee, and that some even set them professional development objectives, specifically relating to implementing the PCC's police and crime plan. CPOSA said this places chief constables under undue pressure to conform with their PCCs or otherwise risk removal from their post. Some of the chief constables we interviewed told us that they had personal experience of this pressure. CPOSA told us this was more likely to be the case for chief constables who needed a contract extension to reach pensionable age.

While the PCC or mayoral equivalent has the power to recruit, and where appropriate remove, a chief constable, the chief constable isn't their employee. Like all police officers, chief constables are Crown servants.

From the evidence of what many of the chief constables and PCCs we interviewed told us, the difference between their roles and responsibilities isn't clear enough. Some PCCs told us they should take responsibility for questions and challenges directed at their force by MPs or ministers. But many chief constables thought it was solely their responsibility to receive and respond to such challenges or requests. We found examples of a PCC responding publicly on behalf of their force in relation to criticism from local politicians. One chief constable told us that anyone with a political challenge in relation to the policing of the force area should raise it jointly with the chief constable and the PCC.

During our inspection we spoke to many chief officers, including the chief constables from the 12 forces we visited. Most of the chief officers told us their PCC hadn't inappropriately interfered or attempted to interfere with their operational independence. But we did hear examples from some of the chief constables of their previous PCCs interfering; interviewees described some of these examples as significant. Similar evidence to that within the 2015 'Tone from the top' report, and the 2018 NPCC 'New Landscape of Policing' report, was provided by retired chief constables. The fact that the chief constables we interviewed were less critical of their current PCC could mean that the situation has improved, or it could be that chief constables are reluctant to criticise PCCs while they, to an extent, rely on them for employment. The NPCC and the Association of Police and Crime Commissioners should work with chief constables and PCCs to make sure they fully understand their roles and responsibilities.

Operational officer and staff experiences of PCCs' political influence differ from that of senior officers

In some forces, we found that the PCC or mayoral equivalent chaired partnership forums that local police area commanders attend. Some of these commanders told us that the PCC frequently gave them operational tasks. One officer said they regularly receive three to four emails a day from the PCC's office asking for an operational response to issues raised. Their records showed that, between April 2023 and November 2023, they had received 75 enquiries relating to their local policing area from the PCC's office. The commanders expressed the view that the level of intrusion by the PCC affects their ability to carry out their role and to remain impartial in policing their areas. This is because of the number of these requests and the time it takes to complete the research for the level of update required.

Some operational officers and staff told us that the political nature of both PCCs and mayoral equivalents often affects them. These officers and staff expressed views that often differed from those of their chief constable. We heard the following examples:

- the public asking officers and staff if their force is Labour or Conservative; and
- officers in a focus group said that, prior to attending a meeting with their PCC, they had been told not to mention or discuss an operational deployment.

This deployment had taken them away from their local community, contradicting the PCC's manifesto promise.

From force to force, views differ on the extent to which PCCs and mayoral equivalents affect the impartial provision of police services. The effect they have on forces' ability to maintain an appearance of impartiality was often a direct result of the interpretation of the 2011 and 2023 Protocols. This interpretation was often inconsistent; that needs to change.

MPs and councillors sometimes try to influence police activity

MPs and councillors are entitled to ask chief constables what they intend to do and to give their views. These politicians represent their communities and society in general, so their collaboration in policing and public safety is essential. But MPs and councillors should share their views in private, so they don't jeopardise the appearance of police impartiality.

In all but the most extreme and unusual of circumstances, MPs and councillors should be very mindful not to publicly criticise, interfere with or otherwise try to influence any decisions in advance of the police implementing them. This is because they could be seen to undermine the operational decisions of police officers and raise questions about whether the police are acting within the law. Nevertheless, it is quite right that the police are held to account for their performance and decision-making after any event or incident.

In our document review, we saw many examples of forces providing advice and direction to their officers and staff in relation to politics, election periods and impartiality. We were pleased to find such advice and, as we said in the chapter on systemic issues under the section titled [Most police officers and staff believe they act with impartiality](#), officers and staff showed an understanding of it.

This understanding is important, because interviewees told us about many examples of councillors and MPs trying to influence operational policing. Some of the examples related to direct contact with officers; others to attempts at influence through the media.

In one force, interviewees told us of an MP contacting a chief officer by telephone about the police response to a public demonstration that had blocked a road. The MP had told the officer that they would receive a call from “the minister” if they didn’t get the road open. The officer outlined their considerations under the Human Rights Act 1998 and College of Policing guidance on policing protest. The force opened the road when it felt it was lawful to do so.

We heard mixed views from chief officers. Some were clear that local politicians weren’t inappropriately influencing policing matters in their force. But others told us that they had recognised attempts to inappropriately influence policing, albeit they had resisted such attempts.

An NPCC lead told us:

“Forces need to ensure they maintain political neutrality. There is a difference between impartiality and party political impartiality. The public do not expect neutrality from the police, but they do expect political neutrality.”

One PCC told us there was no interference with their force because:

“They [MPs] come to me with their issues, and I’ll address it.”

Some officers and staff felt that political interference can result in a prioritised policing response

Some officers and staff (often PCSOs, constables, sergeants and inspectors) gave an alternative view to those of the chief officers. They gave examples of members of the public recognising that the police respond differently if they report things via their MP. This had resulted in a significant increase in calls for service directed to the force through a local politician. In one focus group, interviewees told us that MPs, local councillors and the PCC’s office had a “direct line” to senior officers and they were influencing investigations. Such influence included:

- asking a force to prioritise an otherwise low-priority investigation; and
- trying to achieve a quick resolution to an investigation.

Another interviewee said:

“They get an enhanced service; we drop everything [for them].”

Overt attempts to influence operational policing on a national level challenge police impartiality

One of the most consistent themes in our evidence is the extent to which senior national political figures directly or indirectly influence, or attempt to influence, police operations. Senior police leaders told us that it is harder to maintain an appearance of impartiality when this takes place in public.

It is entirely legitimate for local and national politicians to take an interest in how the police respond to protest, and to scrutinise police decisions. PCCs have an explicit obligation to hold the police to account. And the public are also entitled to have their voices heard through their other elected representatives, such as MPs and local councillors. Forces and politicians alike should pay close attention to the risk of any improper political interference, including the risk of actual interference or perceived interference – whether that perception is accurate or not.

Most chief officers told us that they sometimes experience what they believe to be improper pressure or interference from significant political figures. This can be through direct contact or through the media.

Interviewees told us they had withstood such attempts. Like their officers and staff, senior officers told us that the language senior political figures sometimes use directly affects the public perception of policing impartiality. In many cases, these senior officers told us this was in relation to accusations of policing being “too woke”. Many of those we spoke to – officers, staff, PCCs and interested external organisations – cited this commission and the associated correspondence as one example of this. Some of them voiced frustration at the fact that a national newspaper published the letter to all chief constables before they had received it themselves. Some PCCs and their staff agreed. One asserted:

“Policing is a difficult job and one that is made all the more difficult as a consequence of highly politicised and unwelcome interventions of this sort. The letter is an attempt to politicise the police.”

Most of the examples that interviewees brought to our attention involved the policing response to protest. These included protests relating to highly political topics such as climate change, human rights or international conflict.

In our report ‘Getting the balance right? An inspection of how effectively the police deal with protests’, one example involved a protest that had blocked a newspaper print distribution facility. The resulting court proceedings and media coverage, [such as an article in The Independent](#), included comments from the protestors’ defence team suggesting that a senior political figure had contacted the police to expedite the removal of the blockade.

We make no comment on the accuracy of these media reports, but coverage of this nature risks undermining the force's appearance of political impartiality. This case highlights the caution politicians should take when becoming involved in police operational decisions, even when this is done in private. After the event, their potential influence could become public knowledge. This could be as a result of [disclosure](#) obligations in the course of legal proceedings, resulting in this influence becoming the source of legal defence arguments and giving rise to accusations of prejudice.

Our report 'Getting the balance right?' also described how a gold commander in one force said:

"With any protester removal, safety is the paramount consideration and political pressure to speed up removals and arrests was unhelpful and could have become unsafe due to the removal being at height, with sophisticated protest lock-on tactics."

We reported that we heard from a silver commander who stated politicians were trying to put pressure on the force as they felt it was being "too soft" on protesters, and the police should have been taking a harder line.

During this inspection, we heard about a case in one force in which local councillors criticised the force for allowing a contentious protest to go ahead. The force solicitor had to explain to the councillors that the police couldn't legally ban the protest just because it was an unpopular cause.

Case study 2

In another force, officers told us of significant pressure from senior politicians to deal with a noisy protest outside a political event. The people running the event told the police commanders that senior politicians attending the event had complained about the noise and disturbance. Officers told us that the politicians put pressure on the force to use powers under public order legislation to stop the disturbance. There was a disagreement between the police and the politicians involved. The officers didn't feel the situation warranted a higher level of intervention. In their view, it wasn't a proportionate application of the law. The interviewee told us a senior member of that party wrote to the force demanding a meeting with the police commanders responsible.

Political influence can have long-lasting and far-reaching consequences

Some of the officers and staff we spoke to told us they felt that the enforcement of new laws during the pandemic had shifted the public's view of the police. One focus group stated:

"The public view the police as if we are government agents."

Such a public view would be undesirable and damaging to relations between the police and public.

In many of the forces we inspected we heard from officers and staff who were exasperated by events in London being portrayed as UK-wide policing. In one focus group, participants told us that they had never known a time when senior politicians were so openly politicising policing. They also stated that when the Metropolitan Police Service comes under such scrutiny, the public often perceive it as a reflection of policing generally. We heard similar comments in other forces.

During this inspection, the impartiality of the police response to protest relating to Israel and Palestine in London became the focus of national media attention. The [public commentary from some senior politicians, as reported by BBC News, accused the police of double standards and bias](#). In November 2023, the then Home Secretary called for the Metropolitan Police Service to ban a pro-Palestinian march planned to take place on Remembrance Day. In a social media post, she stated that: “If it goes ahead there is an obvious risk of serious public disorder, violence and damage”. [In an article in The Times, she suggested that senior police officers “play favourites” with protest groups. Many media outlets also reported that the then Prime Minister had summoned the Metropolitan Police Commissioner to a meeting at Downing Street, stating his job was to “hold him accountable”.](#)

The Metropolitan Police Service responded by stating that [there was no power in law to ban the march as there was a lack of intelligence indicating the risks](#) that had been suggested by the then Home Secretary. As we have said before, forces and politicians alike should pay close attention to the risk of any improper political interference. This includes the risk of actual interference or perceived interference, whether that perception is accurate or not. Usually, such an intervention, if deemed appropriate, should be done in private.

The new 2023 Protocol refers to powers for the Home Secretary to intervene in matters of public safety or national security. But this is only if advised to do so by His Majesty’s Chief Inspector of Constabulary. For example, in relation to the policing response to protests in London on Remembrance Day 2023, the then Home Secretary could have sought the advice of the Chief Inspector of Constabulary before overtly challenging the operational decisions taken by the Metropolitan Police Service. On this occasion, she didn’t ask for such advice. Had it been sought, the Chief Inspector of Constabulary would have advised that such an intervention risked impinging on the operational independence of the Metropolitan Police Commissioner.

Another example related to similar protests in London highlights the care that senior political figures should take when expressing their views on police activity. On 13 April 2024, a short video was posted on social media, showing an interaction between a police officer and a Jewish man near to a pro-Palestinian march. [BBC News reported that a source from Downing Street said the then Prime Minister was “appalled” by the behaviour of the officer. In the following days, this quote propelled a negative national](#)

media narrative about police impartiality, with some calls for the Metropolitan Police Commissioner to resign.

It wasn't until 22 April 2024, when the media released extended footage of the interaction, that it became apparent the officer had acted with patience and professionalism. This then resulted in the then [Prime Minister stating that he had confidence in the commissioner](#). Senior politicians should take great care to make sure they are in possession of the full facts before making public statements that can have a detrimental effect on the public perception of police impartiality.

One chief constable we interviewed told us that their experience has indicated an increasing drive from central government to compel chief constables to police and enforce the law in a certain way. As a result of the evidence gathered during this inspection, we formed the view that the polarised positions taken by politicians and the public may prevent them from seeing the police as being impartial. It sometimes leaves the police in an invidious position.

Senior officers protect their operational independence

Chief constables told us that they “hold the line” on operational independence. One said:

“We pride ourselves on freedoms in [the] UK. They come at a price. If you over enforce or over legislate, you will lose them. That’s a matter for government, but [it’s] the balance we are trying to protect as chief constable[s].”

Chief constables must maintain their independence and reject any attempt to be improperly influenced by political figures. It is part of our role as an inspectorate to support them in doing so. Such influence may affect the legality of their actions if they appear to have acted on the basis of bias or for an improper political reason. As our case studies show, we have seen examples during this inspection where police officers have successfully resisted such attempts at improper influence.

But politicians, particularly PCCs, should also hold police forces to account for their exercise of public powers, while respecting the boundaries of operational independence. It is also part of our role to help the public and politicians make sure that the police are held to account through our independent inspection process. This process can provide a basis for informed political debate about policing.

The published consultation responses show that on numerous occasions during the process of drafting the 2023 Protocol, consultees raised the problematic absence of a definition of “operational independence”. This wasn't addressed at that time, and we think this was a missed opportunity.

The convention of operational independence requires everyone – police and politicians alike – to understand and respect their roles, and to vigorously maintain the boundaries between their roles. In doing so, they defend and uphold the principle of policing by consent.

Recommendation 7

By 31 July 2025, the Home Office, in consultation with the [National Police Chiefs' Council](#) and the [Association of Police and Crime Commissioners](#), should publish guidance for the term “operational independence” within the [Policing Protocol Order 2023](#).

3. Communication with the public

In this chapter, we examine how forces communicate with the public, and the guidance available to officers and staff to help them do this effectively. We also examine the way forces use social media and the effect that this, and some factors out of their control, has on public perception of the police.

Guidance and governance arrangements

The College of Policing should update its advice to forces about communicating with the public

The police communicate with the public in many different ways. Face-to-face communication takes place in a variety of settings, for example, at public meetings and community events. Other communication can include press releases, interviews given to the print media and television, or information shared in leaflets. Police also communicate online using social media, websites and other internet-based media. Communication can also be through forces or individuals displaying visible representations, such as flying flags and wearing badges on uniforms.

In October 2013, the [College of Policing](#) published its [engagement and communication authorised professional practice \(APP\)](#). It is the main guidance that relates to communication with the public. It includes sections on engagement, communication and media relations. The APP states:

“Successful policing depends on engaging and communicating effectively with the communities each force serves.”

The engagement section gives information to police forces about:

- why they should engage with the community;
- the benefits of engaging;
- consequences of a lack of or ineffective engagement;
- who to engage with; and
- how to engage.

It states:

“Engagement should be considered as a core element of police activity, informing – and having an impact on – every area of policing. A genuine commitment from leadership plays an important role in ensuring that public engagement is effective.

Leaders and senior managers need to commit the necessary staff time, effort and financial resources to engagement. This may include providing support and training for communities and staff, so that everyone can participate.”

The communication section gives guidance and case studies on a wide range of communication approaches, including the use of online engagement. The guidance in relation to use of social media and online engagement tools is out of date. For example, since 2013 there has been a large increase in the number and variety of social media platforms. The guidance describes just four forms of social media platform or tool, namely Facebook, Twitter (now X), YouTube and blogs. It also refers to a 2013 Association of Chief Police Officers (now the [National Police Chiefs' Council](#)) document, which is no longer in use.

In May 2017, the College of Policing added a media relations section to the engagement and communication APP. This section takes account of the recommendations of [our 2011 report 'Without fear or favour'](#) and the [Leveson Inquiry into the culture, practices and ethics of the press](#). It sets out advice for officers and staff to consider when engaging with the media at or in relation to a range of policing circumstances, such as during significant operations or investigations. It doesn't contain any guidance in relation to the use of or response to social media.

The engagement and communication APP doesn't include any guidance to forces about how they should communicate in relation to matters that are politicised or contested. This needs to change.

Recommendation 8

By 31 July 2025, the [College of Policing](#) should update its engagement and communication [authorised professional practice](#) to give more up-to-date information about communicating using social media platforms. It should also include guidance about how to communicate about politicised and contested matters. The College of Policing should regularly review the updated guidance to make sure it keeps pace with changes to social media.

Forces have a variety of policies that relate to communicating with the public

All 43 Home Office forces have policies or guidance documents that relate to communicating with the public. These range from general communications policies to those that relate to specific types of communication, such as witness appeals or communication with the media. Some forces cite the engagement and communication APP as being their guidance, rather than having their own bespoke policy.

In relation to social media, we have seen policies or guidance to the workforce about using it, usually covering both work and personal use, from all forces. However, most of these policies and guidance documents don't give advice to the workforce about how to use social media effectively to engage with the public. Instead, they focus on what officers and staff shouldn't do when using social media and the potential for a [misconduct](#) investigation if they post anything inappropriate.

Most forces told us that they have a community messaging and communications platform that members of the public can sign up to. Forces use this to share information about topics such as crimes in an area, road closures and crime prevention advice.

Most officers and staff had a good understanding of policies relating to communicating with the public

We found that general communications policies are usually available for officers and staff to read on force intranet sites. Forces don't normally give any specific training to the workforce about such policies.

Forces are more proactive when it comes to updating the workforce about social media policies. All forces told us that a variety of courses aimed at different stages of a police career include training on this subject. Members of the professional standards department often provide this training. In most forces, the communications department gives additional training to officers and staff who have responsibility for posting on their force's social media accounts.

In our call for views, 78 percent of respondents said that they understood their force's social media policy. A total of 69 percent of respondents said that their force's social media guidance contained enough information to help them stay impartial when posting messages.

Communications policies don't give guidance on communicating in relation to contested issues

The general communications policies that we examined didn't give any direction about communicating with different groups within local communities. Where forces gave this direction to their officers and staff, it was in their engagement plans. In our 2023–25 cycle of PEEL inspections, we have found that engagement plans vary greatly, as does how forces record engagement activity. In these inspections, we were pleased to see that many forces have invested in off-the-shelf software to better understand their [hard-to-reach communities](#). They have also invested in community engagement platforms to facilitate and record such engagement. This should help forces to target engagement activity more effectively.

In the communications policies, guidance and plans that we examined, we didn't find any guidance on communicating with the public about contested issues. In a few documents, we saw advice to the workforce about remaining impartial when communicating with the public. This was usually in relation to party politics.

We asked officers and staff about their views on whether police communications with the public about contested issues and social causes help forces be more impartial or not. In our call for views, 43 percent of respondents thought such communications helped the police be impartial, as opposed to 28 percent who thought they didn't help. The remaining respondents (29 percent) said they were neither helpful nor unhelpful. In our public opinion poll, 28 percent of respondents thought that these communications made the police more impartial, and 14 percent thought they made the police less impartial. Of the remaining respondents, 28 percent said that these communications had no impact on police impartiality, and 30 percent said that they didn't know.

Only a minority of respondents in the opinion poll and call for views said that police communications with the public about contested issues and social causes had a negative effect on police impartiality. But this is still important because, [as we describe later in this chapter](#), police communications and stories in the media about the police can quickly go viral and potentially have a negative effect on public perception of the police. Force communications policies need to give clear directions to officers and staff about communicating with the public in relation to contested and political issues and social causes. This should result in fewer police communications that end up being shared widely, with an accompanying negative narrative.

Recommendation 9

Within six months of the [College of Policing](#) updating its engagement and communication [authorised professional practice](#), forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

Forces have effective governance of their communications with the public

We found evidence of effective governance arrangements for communications with the public (notwithstanding the occasional ill-advised comment or mistake made by individual officers or staff). All forces we inspected had a department that dealt with communications, overseen by a [chief officer](#). Most officers and staff we interviewed knew who to contact if they wanted advice about any type of communications with the public.

In many forces, officers and staff with responsibility for posting on force social media accounts told us that their force had a [risk assessment](#) process for posting comments. For example, Cheshire Constabulary and Leicestershire Police had a traffic light system for officers and staff to assess whether it was appropriate for them to post a comment themselves or whether they needed the approval or advice of the communications department.

Most forces told us that as part of their governance process for the use of social media, they had reduced or were reducing the number of social media accounts they use. All forces told us that they monitored force social media accounts to make sure that the posts were appropriate. Some forces had ongoing complaint or misconduct cases relating to inappropriate social media posts. These usually related to activity on personal social media accounts rather than force accounts. The cases that related to posts on force accounts usually resulted in forces dealing with these as opportunities to learn lessons and develop their officers and staff.

We found that most forces use software to evaluate the effectiveness of their social media posts. However, they usually measure effectiveness by the number of times people engage with the posts; for example, by viewing the content, indicating their response (by liking or disliking it), sharing it with other users, or commenting on it. But few forces carried out any form of qualitative analysis, although some told us they have ambitions to do this. Others told us that they didn't have enough resources in their communications departments to do more thorough analysis.

We saw evidence of forces changing their communication style in response to evaluation and feedback from the public. For example, Cheshire Constabulary changed the social media platform it used to communicate with younger people as a result of feedback from the local Youth Commission. West Yorkshire Police had used advertising agencies and voluntary media interns to help it communicate with the public effectively.

Communication using visible representations

Officers and staff often use visible representations as a form of communication

Individuals and organisations often use badges and other visible representations as a form of communication and expression. In this way, they can show membership and support of specific groups, create a sense of belonging and community, and reflect their beliefs and affiliations.

In police forces, visible representations can take the form of items such as badges, patches on uniforms, lanyards, flags and signage on police vehicles. Such communication using visible representation can also take place online when forces and individuals add digital badges to their online profiles.

During our fieldwork, we saw many officers and staff wearing a variety of these badges and lanyards. Officers and staff in nine forces also told us their force had vehicles that had signage supporting causes such as Remembrance and Pride.

Policies relating to visible representations vary across forces

Some forces didn't have a policy containing any direction about wearing or displaying visible representations. Those that did usually had it in their uniform policies.

We found policies and force directions about whether the workforce can wear or display such visible representations were inconsistent and sometimes unclear. Where forces allowed such representations, it wasn't clear to officers and staff, or to us, what they deemed to be appropriate. Often, forces allow discretion within these policies and they leave local supervisors to assess what is acceptable.

For example, policies included permission to wear:

- one or two specific badges;
- one or two specific badges, but with local supervisors allowed to use their discretion to allow additional badges if appropriate;
- anything that doesn't cause offence; and
- anything that doesn't affect the professional image of the force.

Many officers and staff told us that they didn't know what their force allowed but were confident that their supervisors would give them the right advice. Most supervisors told us they were confident that they knew what was acceptable or not.

Even when clear policies were in place, forces didn't strictly enforce them. For example, in some forces we saw officers and staff wearing badges that their force policies didn't allow.

Some visible representations can give the impression to the public that the officer or staff member isn't impartial. Forces have to maintain a fine balance between the benefits, risks and consequences of allowing officers and staff to wear such visible representations or using them on vehicles and buildings.

In our call for views, respondents had mixed views on whether showing support for a cause in this way helped the police to be impartial. A total of 32 percent of respondents said that it was helpful, with 39 percent saying it was unhelpful and 29 percent not giving an opinion either way.

Communication using visible representations risks misinterpretation

Forces need to be aware that, regardless of the intention, visible representations can mean different things to different people who may interpret them in different ways. For example, many officers and staff in England and Wales wear the 'thin blue line' badge or patch on their uniform as a mark of respect and remembrance for colleagues who have died. However, in America, some extremist or far right groups have appropriated the US version of this badge. Therefore, some people believe the UK version of this badge isn't appropriate, and not all chief constables allow their officers and staff to wear it.

Another example is the poppy. Many people choose to wear a poppy in November for Remembrance, to show respect for the people who died fighting in the First World War and subsequent wars or conflicts. But some people view the poppy negatively and choose not to wear it.

While one person may see a badge as a sign of support for a particular group or cause, another may see it as a sign that the wearer isn't impartial. Officers and staff gave us both positive and negative examples of the effect of representations on members of the workforce and the public. In one force, an interviewee told us that seeing colleagues wearing rainbow-coloured lanyards made some new recruits comment that they thought it was an inclusive force. In another force, an interviewee told us that arriving at an incident in a rainbow-liveried police car resulted in negative comments from members of the public.

Views about the benefits of displaying visible representations vary

In our public opinion poll, we asked respondents for their views on whether displaying support for social causes made the police more or less impartial. A total of 27 percent of respondents said displaying such support made the police more impartial, with similar numbers (28 percent) saying that it had no impact on police impartiality or that they didn't know (30 percent). Only 15 percent said that it made the police appear less impartial.

Responses from police officers and staff to our call for views were mixed. A total of 31 percent of respondents felt that wearing visible representations was helpful, compared to 40 percent who felt it was less helpful and 29 percent who felt it was neither helpful nor unhelpful.

Some of our interviewees said that the police uniform shouldn't show any displays of support. They gave several reasons for this, including:

- society doesn't demand the police to be anything other than the police; and
- engagement is more about what officers say and do, not how they dress.

There is an argument that the uniform alone should convey the force's principles, ethics and values. And, as we have said, visible representations may be misinterpreted. They may also jeopardise the appearance of impartiality.

On the other hand, the [public sector equality duty \(PSED\)](#) requires police forces to have due regard to the need to achieve objectives concerning eliminating discrimination, advancing equality of opportunity and fostering good relations. By allowing a visible representation, a police force could be doing just that. And the [Code of Ethics](#) encourages them to "play an active role in recognising and eliminating unlawful discrimination, and in promoting equality of opportunity and good relations between all people".

These are difficult decisions for chief constables. We would find it hard to criticise chief constables who take a strict line, perhaps allowing nothing but a modestly sized visible representation of a cause that generally carries public approval.

Equally, some chief constables may have valid reasons for taking a less strict line, allowing a wider range of permitted visible representations. But we would encourage them to be careful in their choices of representations. And they should consider allowing them for specified periods of time, some of which could be deliberately brief.

Recommendation 10

By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise. The [National Police Chiefs' Council](#) should support chief constables in achieving a consistent approach.

Media narratives

Forces can quickly lose control of the narrative when the media and social media take an interest in an incident

The media has an important role in communicating police messages to the public. For example, the media often helps the police by publishing or sharing articles such as witness appeals, and information messages such as road closures. The media also has an important part to play in helping the public to hold the police to account.

However, many officers and staff told us that they were frustrated at how media stories about policing developed, often very quickly, and sometimes involving political commentary. In one force we inspected, a member of the public posted mobile phone footage of an incident on social media, together with inaccurate commentary about the actions of an officer. Within 24 hours, three million people had viewed the post.

Many interviewees told us they felt let down by forces often not doing enough to respond to the developing narrative when they are the subject of critical reporting and social media comment. This leaves gaps that others sometimes fill with speculation. If not corrected, it can have a negative impact on public confidence and officer and staff morale. Many officers and staff were also critical of the lack of police communications about the good work forces do to keep people safe. An officer in one focus group said:

“They [the force] never push back or defend us – good news doesn’t matter.”

Social media use has vastly increased in the last decade. Even in 2013, when it published the engagement and communication APP, the College of Policing recognised that:

“Lack of engagement can contribute to an intelligence void in high-profile incidents or critical incidents, and this was evident during the disorder that broke out across the UK in 2011. This void can be filled with negative information about the police, which can affect community confidence. Use of social media by the public means that this can happen very quickly. The police need to respond accordingly.”

The [College of Policing’s independent review into Lancashire Constabulary’s operational response to missing person Nicola Bulley](#) raised this as a particular problem. It said that a failure to “adequately fill the information vacuum, allowed speculation to run unchecked”.

The review also stated that:

“Media speculation around the investigation was fuelled by individuals on social media who offered commentary on the developing story and the investigation. This is an issue that all high-profile police investigations have to address, and social media platforms have greatly increased the reach of such commentators.”

In that report, the College of Policing made a recommendation for the police to learn lessons from that case about the effect of social media on police investigations. This included using social media monitoring to help the police judge the relevance, scale and sentiment of social media interest.

Some interviewees told us about the influence of social media commentators on public trust and confidence in the police. They said that the footage these individuals post, together with their commentary, which isn't always based on the full context of the situation, can influence public perceptions of the police. One senior officer told us:

“The biggest threat to impartiality is external social media agitators putting out false information and perceptions about a policing approach.”

It isn't easy for the police to respond to all stories in the media and social media. Often, forces remain silent to avoid prejudicing ongoing investigations or judicial processes, despite having evidence that could have corrected reported inaccuracies. They are affected by restrictions in a way that the social media commentators aren't. And even when a force tries to set the record straight, it doesn't always change the headlines. But forces shouldn't hide behind these restrictions and should respond publicly whenever they can, even if the response may not always achieve the same level of publicity as the original incident. The morale of the workforce may be improved by seeing that the force is attempting to make the position clear.

In its independent review into Lancashire Constabulary's operational response to [missing person](#) Nicola Bulley, the College of Policing recognised the value of non-reportable briefings to the media. These briefings involve giving information to the media for guidance and background understanding only and not for publication or broadcast. Its review found that operational officers were reluctant to use non-reportable briefings. It made a recommendation about rebuilding confidence between the police service and the media and the use of appropriate non-reportable media briefings. We agree with that recommendation.

Social media

Automated social media systems can also influence public perception of the police in a way that forces can't control

Social media platforms hold an enormous amount of content in the form of posts, recordings, photographs and videos. The aim of a social media platform is to keep users engaged with the content.

The platform improves engagement by using automated systems, known as algorithms. These filter and select content based on data the platform has about the user, such as age, location, what they have viewed before, and their search history. For example, if a user has searched for and engaged with footage of police officers using force during an arrest, the platform may push more similar content to them.

This could potentially give that user a distorted impression about the frequency that police officers use force.

Similarly, if the user engages with comments or posts that are particularly argumentative, the platform may give them more content relating to the side of the argument they seem to support. This may give a distorted view of the weight of evidence for that argument.

In this way, social media users who view posts that are critical about police impartiality may have their perception influenced by these automated systems.

Forces may overestimate the effectiveness of their communications using social media and rely too much on this communication channel

When dealing with large-scale incidents or investigations, police forces still tend to use more traditional forms of communications to the public, such as media releases, television or radio interviews and media conferences. However, when we asked officers and staff about communicating with the public, most interviewees focused their answers on communication using social media.

In two forces, neighbourhood officers told us that they had to do at least one post a week on social media. Occasionally, to meet these targets, officers and staff posted information that wasn't relevant to policing. This may affect the public perception of how effective police forces are.

[As mentioned earlier in this chapter](#), most forces don't carry out any qualitative evaluation of their communications on social media. Without this, they can't assess whether they rely on it too heavily as a form of communication.

In two forces, interviewees told us that they were reducing their reliance on social media as their main communication tool. And they were moving to methods that are more controllable and lead to more effective engagement with the public.

Forces need a greater understanding of public reaction to social media so that they can develop the appropriate strategies to communicate more effectively with the public and improve trust and confidence.

Social media research

We analysed 857,000 posts linked to 600 corporate police accounts on one social media platform between 17 January 2017 and 28 November 2023. The research looked at the proportion of posts that related to operational and non-operational activity. Operational activity included posts about topics such as witness appeals, crime prevention advice and road closures. Non-operational activity included posts about topics such as recruitment, and support for other organisations or causes.

This research showed that the bulk of police social media posts on this platform received very little interaction. A total of 8 percent of posts analysed (71,000) received no engagement at all (replies, quotes, reposts or likes) and 57 percent (480,000) received less than 10 replies, quotes, reposts or likes. Taking into account the total number of followers of the police accounts we analysed, 84 percent of posts received less than 1 engagement per follower. This means that forces may be placing too much emphasis on this form of communication.

The analysis used a keyword search to identify operational and non-operational posts. We found that less than 1 percent (7,525) of posts were identified as “non-operational”. A large proportion (72 percent) of these non-operational posts contained words that related to gender and sexuality. Analysis of these posts found that many were related to police matters such as reporting [hate crime](#) and recruitment. We found the same in relation to posts that contained words about race.

Engagement with these non-operational posts was low, with 90 percent (6,771) receiving less than 10 engagements. Only 21 of these posts received over 10,000 engagements. None of them were posted by the force’s main account, and all were reposts of posts from non-police accounts.

The operational posts that received more than 10,000 engagements (1,463) generally related to high-interest news stories such as the arrest of a suspect in a case that had been in the national press or updates regarding policing at a large event.

Of the 600 accounts we analysed, only 5 percent were main force accounts. These were responsible for 7 percent of the overall posts. The other accounts were either held by individual officers and staff, teams and units (such as the cybercrime unit). A total of 3 percent of posts were from accounts held by staff networks.

Other external influences can affect public perception of police effectiveness and impartiality

Bots are computer programs that automatically complete tasks. Organisations often use bots for positive reasons; for example, as a chat function on a website so that customers can communicate with them without having to wait in a queue on the phone. Some companies use bots to influence consumer behaviour and increase sales. Some groups or individuals use bots maliciously to pretend to be real people and spread information that isn’t factually correct.

In the context of social media, these automated programs – many of which are run by hard-to-identify individuals or organisations from outside the UK – mimic humans and post large volumes of content very rapidly. They may have undue influence on public opinion, including opinion about the police.

Some of our interviewees raised the issue of the influence of bots on public perception of the police. They told us that on some occasions, when social media posts criticising police activity in their area had gone viral, they firmly believed that this was due to the influence of bots and individuals from other countries.

Case study 3

In September 2022, a period of disorder in Leicester resulted in a large number of arrests. Interviewees told us that they believed that some false and inaccurate posts on social media were partly responsible for the severity of the disorder.

Analysis carried out by the force showed that, during September 2022, social media users viewed the force profile 4.4 million times, compared to an average of 250,000 times in other months.

[The BBC analysed posts on social media](#) made during the period of this disorder. Its analysis identified that, of a sample of 200,000 posts on one social media platform, accounts geolocated in India initiated just over half the posts that mentioned the unrest. Some of these posts from India gave accounts of incidents that weren't true. For example, these posts reported that people were attacking a mosque or that there had been an acid attack. Others then shared these posts, which spread the misinformation further. Leicestershire Police responded by clarifying that such accounts weren't true, and it asked social media users to only post information that was factually correct. The BBC also reported that one offender convicted of being in possession of a bladed article at the disorder told a probation officer that social media had influenced their actions.

Many of the chief constables we interviewed stated that they have started to communicate less on social media. They cited two reasons for this. The first was the risk of other social media users misrepresenting or distorting police communications to serve their own agenda. The second was automated bots.

In two forces, senior officers told us that they believed there was research available about the influence of bots and social media users from outside the UK on community tension and public sentiment towards the police. However, we couldn't find any such research. This lack of research needs to be addressed.

Recommendation 11

By 31 July 2025, the [National Police Chiefs' Council](#) should carry out or commission research into the influence of bots and non-local social media users, and how this can fuel community tension.

The [College of Policing](#) should include any learning from this research in the revised engagement and communication [authorised professional practice](#).

4. The Equality Act 2010 and the public sector equality duty

In this chapter, we report on how effectively police processes and policies comply with the legal obligations placed on police forces by the [Equality Act 2010](#) (the 2010 Act). We also examine how such policies affect police decision-making. And we assess the suitability of the learning and development provided to [police officers](#) and [staff](#) to help improve their understanding of the 2010 Act and the [public sector equality duty](#).

Policies, processes and governance arrangements

There is consistent evidence that forces comply with the requirements of the Equality Act 2010 when developing policies and processes

We reviewed documents from each of the 43 Home Office police forces in England and Wales. We found consistent evidence that forces comply with the requirements of the 2010 Act. In some forces, we were pleased to see evidence of them using templates for policies and processes, which include sections for statutory compliance and consultation requirements under the 2010 Act. In some forces, the legal services team approves policies, which provides some reassurance of compliance with the legislation.

We also heard about forces making reasonable adjustments to the workplace to cater for the needs of people with disabilities. For example, Leicestershire Police had a policy covering redeployment as a reasonable adjustment for personnel with disabilities. The policy was set in the context of the Employment Rights Act 1996 and the 2010 Act. We also found that other forces considered equality-related legislation in addition to the 2010 Act.

Forces use equality impact assessments

In chapter 1, we explained what an [equality impact assessment \(EIA\)](#) is. We found forces used EIAs to help them comply with the public sector equality duty. For example, Greater Manchester Police didn't approve policies without completing the equality impact section in the policy template. EIA training for policy owners and members of the force's strategy, policy and planning team complemented this. The force gives guidance to officers and staff on completing an EIA when writing or reviewing a policy and process.

During our fieldwork, we randomly chose and examined some force policies. In Northumbria Police, we found that the force complied with the obligations of the 2010 Act and produced effective EIAs to support its policy and processes.

But forces don't always complete equality impact assessments consistently or thoroughly enough

In one force, we found its EIAs didn't contain much rationale to support its decision-making. The force supplied three 2023 policies and the associated EIAs for us to review. We reviewed the EIAs and found they didn't have enough detail about considerations against the nine [protected characteristics](#).

In another force, interviewees told us that the force has a "tick in the box" approach to completing EIAs. They said that when the force sent policies for consultation, there was a tendency to find that the EIA was either incomplete or not completed at all.

In a different force, an internal audit had identified that not all policies and processes had a completed EIA. The force had assessed this as a risk.

There isn't enough training in some forces for those completing equality impact assessments

The Metropolitan Police Service supplied a flowchart that leads personnel through a series of questions to help them decide if they need to complete an EIA for a business proposal, project or operational matter. The flowchart offers some guidance to officers and staff on completing the EIA in that it signposts which forms they must complete and what sections of the template they must fill in. It also directs them on the oversight and authorisation process. A central team of subject matter experts supplies training and workshops to people whose role involves completing EIAs.

In West Yorkshire Police, where a policy owner or author doesn't receive training in how to complete an EIA, guidance is available from specialist trained personnel to help them.

But we didn't find similar examples in every force we inspected. Officers and staff in half the forces we visited told us that there was a lack of training for EIAs and that sometimes this means they aren't completed in enough detail.

There is some confusion between equality impact assessments and other assessments

In two forces, we found evidence that some senior officers and staff were confused between EIAs and other assessments such as [community impact assessments \(CIAs\)](#) and welfare [risk assessments](#). In one force, when we asked interviewees about their use of EIAs, they instead referred to CIAs. When we asked the same question in another force, some interviewees spoke about welfare risk assessments.

In another force, an interviewee told us that the force should have completed an EIA for an officer returning to work from maternity leave. But in this case, we thought a welfare risk assessment would have been more applicable. We were pleased to note that the force had arranged for the [College of Policing](#) to supply EIA training to help 30 policy owners complete EIAs when writing, reviewing or updating policies.

Recommendation 12

By 31 July 2025, chief constables should make sure that those personnel responsible for completing [equality impact assessments](#) are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

Forces don't systematically review all policies and processes

We found little evidence of regular and systematic reviews of policies and processes, even when senior officers or staff told us their force had a robust process for doing these. We found evidence that some forces hadn't reviewed policies, or that their planned reviews were long overdue.

In one of the forces we inspected, a senior officer told us that the force kept policies under constant review, updating them if any changes were needed. However, we found that the force had a significant backlog in reviewing existing policies and processes. Many policies were well past their set review dates. In another force, we identified a similar problem. For example, the force last reviewed the gender reassignment policy in 2018 and its [police staff](#) discipline policy in 2020.

It is important that forces have a process to check for emerging case law and legislation. They should keep policies up to date so that they reflect changes in the law and allow officers and staff to make decisions based on the correct information.

Recommendation 13

By 31 March 2025, all chief constables should audit their policies that include or relate to the [Equality Act 2010](#). They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

There are some examples of forces going beyond the nine protected characteristics, but with a rationale or justification for doing so

Earlier in this report, we summarised the primary obligations set out in the 2010 Act, specifically in relation to the nine specified protected characteristics. During our inspection, we looked for evidence of forces going further than, or contravening, their obligations under the 2010 Act. Where we found such examples, we asked what the force's rationale or justification was. In many cases, these related to internal policies and processes affecting the workforce.

As a result of feedback from officers and staff, Dyfed-Powys Police introduced a military veterans staff network. The support the force gives to members can include support for those with mental health problems experienced due to their military service. Therefore, this would be likely to come under the protection of the Equality Act 2010.

The Suffolk Constabulary disability management policy went beyond the obligations of the 2010 Act. The constabulary had decided that: "It is best practice to assume that someone who is asking for support for a health condition does indeed need that support." In practical terms, the force made adjustments to support an individual, rather than spending time assessing whether that person met the disability definition.

Several forces, including Cheshire Constabulary and Greater Manchester Police, went beyond their strict obligations. They considered how the cost of living and financial hardship may have affected their officers and staff. These factors were considered when the forces made decisions about where to post them, for example.

It is a matter of opinion whether any of these examples go beyond or contravene the parameters and obligations set out in the 2010 Act. In some of the examples above, such as those from Dyfed-Powys and Suffolk, it is likely that the health issues will be afforded protection under the protected characteristic of disability. Even if they aren't, we don't consider these examples to be unreasonable or unjustified. But not everyone agrees.

Some external organisations believe forces aren't justified when they go beyond their equality legislation obligations

We did hear evidence, from some of the external organisations that we spoke to, that some police policies and processes go beyond or contravene the obligations set out in the 2010 Act without justification. These interviewees didn't name the forces or policies they referred to, so we haven't been able to check the policies ourselves or get a response from forces.

Members of one organisation told us that they thought some force policies were unlawful. They cited, as examples, policies which treated an officer wishing to transition as their self-identified sex. The concerns centred around the need to make sure that "males who identify as females" don't search women. They also

expressed their concerns about the use of female safe spaces such as toilets and changing rooms.

Members of another non-police organisation told us that they believe forces contravene the 2010 Act. They said that, in their view, police forces have adopted self-identification as if it is the law when it is not. They said forces substitute “gender” for “sex” in EIAs and so don’t usually assess or consider sex in EIAs. The interviewees said that police use the term “gender identification” rather than “sex”. The interviewees felt that gender identification wasn’t defined within legislation. The organisation’s representatives also told us that they believe police forces “wilfully misunderstood” legislation, especially in respect of single-sex exemptions. Their view was that gender reassignment is a one-time process, not something that people can move between depending on how they feel on any given day.

We have seen evidence of police forces having to make challenging decisions. Many of these decisions require careful consideration of the different and overlapping pieces of legislation and guidance involved. These include the [Police and Criminal Evidence Act 1984 \(PACE\)](#), the [PACE codes of practice](#), the [European Convention on Human Rights](#) and relevant employment law.

There isn’t enough evidence for us to offer a view on whether the examples we have discussed are right or wrong. As we have said before, the context in which the police make these decisions is fluid and often unique. Our recommended review of the Equality Act 2010 would help forces make these difficult decisions.

Forces are trying to navigate this complex legal framework

We found forces were committed to meeting the requirements and outcomes covered within the legislation. They were also alert to the real risk of litigation. Losing an employment tribunal can cause significant reputational damage and financial loss to a force. Therefore, they are right to be cautious. In their attempts to meet the requirements of the 2010 Act and the public sector equality duty, the police often secure legal advice. But this will relate to a specific set of circumstances, and it isn’t easy to apply it to other cases.

Case study 4

In 2021, the [National Police Chiefs’ Council \(NPCC\)](#) published guidance to forces relating to “searching by trans employees of the police service”. Prior to publication, it consulted external organisations, the Home Office and police forces. The NPCC instructed a legal advisor to check the proposed guidance was in line with legislation. The NPCC presented the final version to the Chief Constables’ Council, which approved it.

After publication, the legal position changed. In *Forstater v CGD Europe* [2022] ICR 1, the Employment Appeal Tribunal's decision materially changed elements of how public authorities should understand certain [protected characteristics](#) under the 2010 Act. This legal position changed again in 2023 following [litigation in the Scottish courts](#). In January 2024, the then Policing Minister, The Rt Hon Chris Philp MP, requested that the NPCC review the guidance in light of the legal changes.

These examples show the difficulties police forces face when dealing with these matters. Forces need to balance the rights of individuals, some who hold diametrically opposite views, and still find a way through the complex area of equality legislation. This applies to their own policies as well as to their work protecting the public.

Not all forces had adopted this NPCC guidance before its withdrawal. Some forces have their own policies for searching by transgender employees or searches on trans detainees. In one force, a senior officer told us that, for some transgender or non-binary individuals, compliance with [PACE](#) can be difficult. The force's custody policy tried to balance what is right for that person and their wishes in line with national guidance. In situations such as when officers need to search a detainee in custody, there would usually be a conversation with the [custody officer](#) and the individual. This determines who is the most appropriate officer or staff member to do the search.

One force had an internal [ethics committee](#) that discussed ethical dilemmas. We reviewed the minutes from one of the meetings. One dilemma raised was what to do if a non-binary individual wanted to attend the women-only meetings, which might make some women feel uncomfortable. The committee recognised that it was a "fine balance between abiding by the Equality Act and providing a safe, confidential environment for staff".

As we outlined in chapter 1, many of these challenging scenarios require police forces to consider multiple legal and procedural frameworks. The complexity of the 2010 Act is one area where greater clarity would support more effective decision-making.

Some forces have a policy of placing particular emphasis on those with certain protected characteristics

We found examples of forces placing particular emphasis on those with certain protected characteristics (usually in respect of race, sex and sexual orientation).

Senior officers in one force told us they worked hard to build the confidence of Black communities in their force area and of Black officers and staff internally. The force also told us it did a lot of work to address misogyny. The senior officers said these areas

have the greatest adverse impact on confidence in policing, internally and externally. They said this wasn't at the expense of other protected characteristics.

In another force, some interviewees told us the force gave more support to ethnic minority groups because of its race action plan. The interviewees said that race equality had more momentum than the other protected characteristics.

We found evidence that one force gave more support to the protected characteristics of race and sex than to other protected characteristics. From the documents we reviewed, it wasn't clear to us that the force had a rationale or any justification for focusing its support in this way. The force also focused activity to understand and address disproportionate outcomes from crime investigations in relation to the protected characteristic of race. But it did this without taking similar steps to consider people with other protected characteristics, who may also have experienced such disproportionality. This highlights the importance of completing a comprehensive EIA. By not giving some groups an appropriate level of support, forces risk discriminating against those with other protected characteristics, such as disability, age or some faiths.

Staff network representatives in one force told us that, on a national level, there was more focus on improving policing's approach towards females than other protected characteristic groups. They said the focus on improving how policing approaches violence against women and girls was proper and justifiable. However, they also said that policing hasn't matched this with focus and progress in other, similar areas, such as the race action plan.

Many forces give equal support to officers and staff with different protected characteristics

We found many examples where forces give equal support to different protected characteristic groups within the workforce. West Midlands Police provides support for officers and staff through its Brave Space initiative. The initiative stemmed from a Black officer who shared their personal experiences with colleagues to improve cultural awareness. It became a forum where people with other protected characteristics could share their stories. The Brave Space initiative also features in the force's recruit training. The initiative has extended to include a QR code scheme for anonymous reporting of misconduct. An interviewee told us that peer group reporting led to the dismissal of a recruit for making racist comments.

Some interviewees in Greater Manchester Police told us that the force aimed to provide equal support to different protected characteristic groups. Staff networks endorsed this view.

We were pleased to see that several forces had developed "passports" to record any agreed reasonable adjustments or support in the workplace. Personnel use these when they move roles or to different departments. They allow new supervisors to understand what reasonable adjustments personnel need. The passports follow

officers and staff throughout their careers and provide an easy source of reference for any line manager. This means that the individual doesn't have to recount experiences or discuss matters of an emotional or sensitive nature. Although initially developed for officers and staff with disabilities, we saw evidence that some forces have extended the use of passports to allow for provisions to be made for officers and staff in other circumstances.

Most forces consult with unions, staff associations and staff networks when they are developing new force policies

In Greater Manchester Police, interviewees told us that when the force writes or amends policies, it consults:

- trade unions;
- staff associations;
- force networks;
- legal services;
- local authorities; and
- community safety partnerships.

They told us that the force doesn't agree or implement a policy until the force policy group checks that staff consultation has taken place. We also found that some forces consult external advisory groups when writing and reviewing policies. We examine this in more detail in chapter 5.

Interviewees in Northumbria Police told us that the force consulted with unions on new policy and changes to policy. The force regularly communicates with the unions, and interviewees were very satisfied with the level of force engagement around policy and process. We also found similar examples of consultation with staff networks when developing new policies in other forces. The National Association of Muslim Police told us that it works closely with the College of Policing to supply guidance for training, policies and processes.

Police forces often struggle to recruit and retain candidates from certain minority groups

For employment purposes, the 2010 Act allows positive action, provided it is justified and proportionate. During our inspection, we heard from a national police leader who told us that there may be a need for some legislative changes around positive action. They felt that the fear of straying into positive discrimination and subsequent legal challenge hampers forces' efforts to be innovative. They said that policing could be bolder in recruitment, retention, and progression, especially where there is an operational or organisational need.

Another national lead thought that processes had changed to make sure that there is a “level playing field”. The interviewee was clear that this wasn’t about changing the standards but about “getting everyone to the starting line”. A national staff association representative told us that there was a need for increased positive action approaches for policing to be fully representative of its communities. They said that forces shouldn’t rely on a few individuals to represent the views of community groups.

An interviewee in Sussex Police told us that its positive action team reviewed what the force did to make sure that it didn’t stray from positive action into positive discrimination. The team mapped out what was acceptable and what was “blurring the lines” between them. If the lines appeared blurred, the positive action team consulted a legal advisor.

Sussex has a large LGBTQ+ community. An interviewee told us that there was a lot of activity to engage with this community, and 12 percent of the force’s new officers had identified themselves as LGBTQ+. The interviewee thought that successful engagement with the LGBTQ+ community helped the force to meet its [Police Uplift Programme](#) targets.

In another force, the positive action strategy outlined that applicants from Black and ethnic minority communities got mentors at the start of their recruitment process. Mentors supported candidates with the assessment centre and the interview. They stayed in contact until the end of the process or when the candidate got an offer of employment.

In West Midlands Police, we heard that it also used positive action in its recruitment campaigns. Support groups offered mentoring and coaching to prospective candidates. Although the networks focused on under-represented groups, they offered similar support to others. The interviewees told us that they felt attitudes had changed and there was a better understanding of diversity, equality and inclusion. They viewed the support as encouragement rather than favouritism towards under-represented groups.

An interviewee in Greater Manchester Police told us that when the force wanted to recruit new officers, it didn’t advertise for specific under-represented groups. Instead, it used positive imaging in its recruitment campaigns which the force thought similar candidates in the community would identify with.

Some officers and staff confuse positive action with positive discrimination

A national police lead told us that a lack of understanding of the nuances between positive action and positive discrimination limits how policing uses positive action.

In some forces where the workforce didn’t fully understand the principles of positive action, and sometimes confused it with positive discrimination, we found officers and staff who felt frustrated, resentful and disadvantaged.

One example, where the interviewees felt that the force contravened the obligations of the 2010 Act, shows the difficulties forces face. They regarded supplying free promotion textbooks to some officers with certain protected characteristics, and giving them time off to study, as positive discrimination rather than positive action. The interviewees felt it was a well-intentioned but poorly executed initiative which did more harm than good. They told us that officers seeking promotion also felt this was unfair and a step too far.

Despite this confusion, we didn't see evidence to suggest that recruitment practice goes beyond what the legislation allows. We acknowledge this hasn't always been the case. In 2018, an employment tribunal, [Mr M Furlong v The Chief Constable of Cheshire Police](#), concluded that Cheshire Constabulary had used positive discrimination unlawfully in its inappropriate use of a tie-break policy when selecting recruits. In this case the force had set a threshold at which point candidates achieved a pass mark, but they didn't consider the fact that some candidates scored a higher pass mark than others.

In our call for views, we asked officers and staff if they thought targeted support for officers from groups that are under-represented in policing helped the police serve their communities. A total of 57 percent of respondents thought it was helpful, 18 percent thought it wasn't helpful and 25 percent said that it was neither helpful nor unhelpful.

When we asked the public a similar question, they were less positive about the effectiveness of this targeted support. A total of 37 percent of respondents thought it was effective in helping the police to serve their communities, 23 percent said it wasn't effective and 40 percent didn't know.

In some cases, positive action wasn't always welcomed by those it aimed to support

Members of a focus group told us that their force gave an officer some textbooks to help him prepare for a promotion process. The officer had previously expressed an interest in the promotion process. They told us that he asked why the force had given him the textbooks. The force told him that it was because it considered him a positive action candidate. The officer felt uncomfortable with this treatment.

In another force, attempts to increase the number of female candidates for an inspector promotion process failed. No candidates came forward. Interviewees told us that some prospective candidates rejected offers of extra support, on principle, as they didn't want others to think they were receiving preferential treatment.

These are both examples of the challenges forces face in trying to strike a balance and support people – without asking them what they might want.

Learning and development in relation to the Equality Act 2010

In chapter 2, we commented that the 2010 Act, and its related guidance, is a significant piece of legislation. Some of the topics it covers, such as gender reassignment, sex and belief, are complicated – and how they apply in individual circumstances is contested. Much of this is the subject of emerging case law, which police forces and the College of Policing need to interpret and respond to quickly.

Forces use external advisors to help with learning and development

Some forces use a combination of external organisations and members of local communities to help them understand the importance and impact of their interpretation and use of the 2010 Act.

Some forces consult external advisors during the development of their training courses. In West Yorkshire Police, the first proposal for new cultural awareness training was for a half-day online programme. But following the advisors' review and feedback, the force revised this plan. It extended the course to two days' classroom activity with contributions from external speakers.

Another force reviewed feedback from attendees and external advisors, which suggested the course they had attended wasn't relevant to issues affecting the force at that time. The force considered this feedback and redesigned the course.

Working with external groups or organisations, including those which hold views that others could find challenging, is important

After officers and staff receive their initial training, forces give them ongoing learning and development opportunities. Working with external groups gives officers and staff the opportunity to understand the diverse needs of all communities. It often means they can police and serve them more effectively.

Several interviewees told us that as part of their training, it was important to hear opposing perspectives. To achieve this, some forces use external speakers who aren't necessarily supportive of policing. These speakers came to talk about their experiences, especially their interactions with the police. Interviewees said it was important to make sure that officers and staff get a broad view. They also told us it was important that not all external trainers and speakers were "pro-police". But some interviewees said that good training from external sources was too expensive.

A senior leader in West Midlands Police told us the force worked with external subject matter experts to support the content and provision of training. External speakers brought their lived experience to support police officer training. The force made sure that it had clear aims and objectives for using the external speakers. It also checked and approved the speakers' lesson plans. One interviewee gave an example of an external speaker who attended a senior leaders' event where attendees debated "who is to blame for racism". The interviewee said this event helped attendees reflect on their own views.

The National Association of Muslim Police said it had given training on Islam and cultural awareness to new student officers in a number of forces. This covered topics such as Ramadan, custody considerations and activity around mosques at key religious times. The association also provided training packages on how to build trust and confidence with Muslim communities. The association hopes to offer this training to more forces.

Forces assess the credibility of advisors and external learning and development providers

We found evidence of forces having worked with external organisations and community representatives to provide formal training. These forces:

- identified learning and development needs;
- had a process to assess the quality and accuracy of the training material; and
- considered the credibility of those providing it.

We heard from interviewees that Gloucestershire Constabulary had invited members of two external advisory groups to attend and observe equality training and provide feedback. The constabulary also invited members of one of these groups to take part in the course to talk about their lived experience. Learning and development personnel from the force evaluated its effectiveness.

An interviewee in another force told us that it used external suppliers who other forces had already vetted and used. It made a conscious decision to use more subject matter experts. The head of diversity, equality and inclusion (DEI) vetted all material to make sure it fitted with the force's standards and values.

In West Midlands Police, an interviewee told us that the force had a process for quality assuring external learning and development. It quality assured all the material and assessed external speakers before they had any contact with police officers or staff. There was always a force trainer present to make sure content was impartial and appropriate.

During our inspection, we saw evidence of forces continuously reviewing the appropriateness of relationships with external training providers and advisors. Where it had become clear that continuing to work with – or being seen to work with – an individual or group put the force's reputation at risk, it had ended the relationship.

Face-to-face training brings diversity learning to life

Where forces had used individuals to discuss their lived experience, generally officers and staff said it had brought the training to life. They told us it had a real impact and improved their understanding.

In Sussex Police, interviewees told us about an officer with an Indian background who explained to them the impact of their lived experience. The officer shared their own body-worn video to demonstrate their personal experience of hate incidents. Interviewees told us that this had a profound effect on their understanding and appreciation of the impact of this sort of behaviour. One member of a focus group said: “This is the best input I have ever had.”

In Leicestershire Police, we heard from officers who thought their face-to-face training was very good and greatly improved their learning experience. They said that a DEI professional who gave the training was experienced and knowledgeable, and could talk about their lived experience. One group member said that they took more away from this training than any other training in 26 years of service.

Most forces use the College of Policing’s hate crime and diversity, equality and inclusion material for the learning and development of their workforce

The College of Policing’s online platform is called College Learn. Many officers and staff still refer to this by its previous name of NCALT (National Centre for Applied Learning Technologies).

The College of Policing told us that as DEI has developed and become more complex, it is clear that the knowledge provided to officers isn’t enough to deal with some areas of the 2010 Act. A good example of this is the lack of detail around “genuinely held beliefs”. At the time of our inspection, this wasn’t covered in the training given to officers. The College of Policing hasn’t developed any package to help officers understand this aspect of the 2010 Act. It is an area that the College of Policing told us it wants to develop in 2024.

It also told us that College Learn was always intended to provide a basic understanding of the 2010 Act and nothing more. The interviewee went on to say that this basic level of learning and development makes it extremely challenging for sergeants and inspectors who need to feel confident in providing training and explaining equality legislation to their officers.

We reviewed the College Learn package on DEI. We found it to cover the main topic areas and we thought the content was accurate and relevant. It was brief, which might be expected for online learning. We agree with the assessment by the College of Policing that it doesn’t expand enough on the concepts of belief. This is an area of equality legislation that is complex, evolving and one that forces need greater support with.

In our call for views, we asked officers and staff if they thought DEI training helped the police serve their communities. A total of 64 percent of respondents thought it was helpful, 16 percent thought it wasn’t helpful and 20 percent said that it was neither helpful nor unhelpful.

We also asked about this in our public opinion poll. A total of 43 percent of respondents thought that DEI training was effective in helping the police to serve the community, 22 percent thought it wasn't effective and 35 percent said that they didn't know.

We also asked officers and staff whether they thought DEI training helped the police to be impartial. A total of 67 percent of respondents said they thought it was helpful, 15 percent thought it wasn't helpful and 18 percent said that it was neither helpful nor unhelpful.

When the public were asked if they thought that DEI training affected police impartiality, 34 percent of respondents said that it made the police more impartial and 10 percent said it made the police less impartial. A total of 27 percent said that they thought DEI training had no impact on police impartiality, and 29 percent didn't know.

Many officers and staff are critical of the online learning for diversity, equality, and inclusion

During our fieldwork, most of the officers, staff and staff associations we spoke to were critical of the quality and effectiveness of the online learning training method. Officers and staff told us consistently that they preferred face-to-face training for such a complex subject. One interviewee told us that the online learning didn't give any opportunity for debate or discussion. And it didn't allow officers and staff to ask for clarification on certain points. In contrast, an interviewee told us about the College of Policing level 2 leadership training course for newly promoted sergeants and inspectors. It includes one full day (of a five-day course) about protected characteristics, discrimination and flexible working. The interviewee told us this face-to-face training "shows the force are invested in it".

Some forces have developed their own training material to complement what the College of Policing provides

In West Midlands Police, an interviewee told us that the force ran thematic initiatives focusing on culture and behaviours. One campaign focused on challenging behaviours and perceptions, and instilling in officers and staff the confidence to have difficult conversations. Cultural awareness training focused on matters relevant to Black and Muslim communities and their way of life. The force told us this is important because of the mistrust of the police among those communities, and the force's need to understand why this is the case. The interviewee said that the force had found that some behaviours by officers and staff may be due to lack of understanding rather than discriminatory attitudes. Officers and staff told us they found this additional training beneficial.

Forces make sure all officers receive equality training when they first join the force

In all the forces we inspected, we heard that when officers first join, they receive equality training as part of their induction or initial training. Some examples included external members of the community speaking directly to newly appointed officers.

The Metropolitan Police Service gave us another example. The force told us that it makes sure that the training for all new recruits includes members of the community who talk about their lived experience and perspectives. It also told us that community-led discussions with smaller groups of officers help recruits to reflect on and explore what they had heard.

Refresher training on equality is inconsistent and isn't given in some forces

In our document review, we learned that Sussex Police provides its officers and staff with DEI refresher training. The officers and staff we interviewed in the force were positive about this training. In one focus group, interviewees told us that the provision of training has evolved from online packages to more varied methods. These include lectures, inputs on lived experience, webinars and “let’s talk” sessions. The interviewees thought that the lived experience contributions had been very beneficial.

We also found evidence that West Midlands Police has a two-day cultural awareness programme which every member of the force is expected to attend. The programme is part of the force’s response to the national [Police Race Action Plan](#) and includes elements of the 2010 Act. The officers and staff we interviewed in this force were also positive about their DEI training.

But this isn’t the case in some forces. Officers in one force told us that they hadn’t received any equality-related refresher training since their initial course. In another force, a group of operational officers told us that there was no refresher training on the 2010 Act. They had all completed the online (College Learn) package within the last three to nine years but not received anything further. In a different force, interviewees told us that there is no DEI refresher training unless a specific event triggers it.

A national network lead told us that DEI refresher training is lacking, with no overarching DEI package mandated or available to officers and staff.

Equality-related learning and development for supervisors is inconsistent

In one force, interviewees told us that all sergeants and inspectors had to attend a leadership development programme that included a one-day DEI course. Another force had provided supervisors with additional training that concentrated mainly on matters relating to race.

Officers and staff from support networks in a different force said their force didn't supply adequate training to its police supervisors (sergeants and inspectors). They told us supervisors struggled to understand why they should comply with the 2010 Act. And they struggled to understand their responsibilities in relation to the 2010 Act, especially across the nine protected characteristics.

Recommendation 14

By 31 March 2025, the [College of Policing](#) should work with forces to evaluate and improve diversity, equality and inclusion training. This should include a consideration of the effectiveness of online training for this type of material. The College of Policing should regularly review and refresh guidance on the [protected characteristic](#) of belief, in line with emerging case law.

Equality-related learning and development for senior officers is more comprehensive

In addition to the core learning and development that senior officers complete during their early career, there are leadership development programmes for both senior and executive levels. The [police leadership programme \(PLP\)](#) at stage 4 is designed for chief superintendents, superintendents, chief inspectors, and police staff performing equivalent roles. This is a nine-month programme which consists of four modules. Candidates cover areas such as inclusive leadership skills and the ability to support communities and partnerships.

Over a nine-month period, candidates complete four modules. In module 3, candidates develop their inclusive leadership skills. The College of Policing describes the desired outcome as being able to:

“Understand the role of the senior leader in enabling an inclusive environment, with a focus on positive change in the workplace. Explore the significance of organisational culture and accountability.”

Module 5 concentrates on candidates' ability to support communities and partnerships. It aims to:

“Explore the role of the senior leader in supporting communities and partnerships, working through effective communication strategies to maintain and develop relationships. Understand the importance of effective communication in making key decisions, often with competing priorities.”

During this inspection, we found that senior officers and staff had a good awareness of the 2010 Act and their responsibilities in relation to DEI. But the content of these modules needs to change to reflect the complexity of contemporary social politics and emerging case law.

New chief officer and police staff equivalent training includes a greater focus on diversity, equality and inclusion

In 2023, the College of Policing introduced a [new executive leadership programme to replace the previous strategic command course](#). Candidates provide a portfolio of professional evidence upon application and then maintain it throughout the 12 months of the programme. The programme develops aspiring [chief officers](#) in four key areas:

- ethical and inclusive leadership;
- business skills;
- political acumen; and
- leadership of major policing events.

The College of Policing told us that this new programme contains material and guidance on:

- the Police Race Action Plan;
- positive action;
- workplace adjustments;
- passports for workplace adjustments; and
- EIAs.

Most of the chief officers and police staff equivalents we spoke to during this inspection had a good understanding of the 2010 Act. However, as we have already mentioned, this is a complicated and fluid topic; even the appropriate terminology to be used changes rapidly. The training material and opportunities for executive leaders must keep pace with change. We were pleased to learn that the College of Policing is planning to respond to the findings of our inspection and develop the course material accordingly.

5. Advisory groups

In this chapter, we examine how effectively forces select and use external advisory groups and panels. This includes how representative these groups are of local communities and their level of independence. We also examine how well forces obtain a range of views from groups and panels, and from those that may not be represented in a formal setting.

Guidance and governance arrangements for external advisory groups

Police forces have been using advisory groups for many years

Since 1999, and in response to recommendations in [the Stephen Lawrence Inquiry report](#), many police forces in England and Wales have set up [independent advisory groups \(IAGs\)](#). The report recognised that:

“First and foremost and fundamentally we believe that there must be a change so that there is genuine partnership between the police and all sections of the community.”

Therefore, since 1999, forces have brought together people and organisations to discuss policing-related concerns, particularly in communities with low trust in the police. These IAGs have developed and now include other groups or panels that the police use, often referred to as external advisory groups. For example:

- community groups at a local neighbourhood policing level;
- community scrutiny panels (CSPs) in which members of the community review local police interactions with the public, including the use of police powers such as stop and search;
- [key individual networks \(KINs\)](#);
- accountability meetings that bring together members of the public and the police, to scrutinise the police at a force-wide level; and
- independent [ethics committees](#).

In this report, we will refer to these advisory groups and IAGs as external advisory groups.

[Police and crime commissioners \(PCCs\)](#) also engage with communities through external advisory groups. However, the overall purpose is to give communities a

voice in police decisions and provide advice on developing successful partnerships. This includes helping forces to understand how their role can affect diverse communities.

Guidance on the role of external advisory groups is outdated

In 2015, the [College of Policing](#) published a guidance document: '[Independent Advisory Groups: Considerations and advice for the police service on the recruitment, role and value of IAGs](#)'.

Since 2015, the use of external advisory groups has grown, and the guidance doesn't reflect this. This growth is seen in the increased number of [authorised professional practices \(APPs\)](#) that mention advisory groups. For example:

- stop and search;
- engagement and communication;
- national decision model;
- critical incident management: phase 3 – restoring public confidence; and
- community engagement and tension.

While the various APPs recognise the importance of external advisory groups, the overarching 2015 guidance doesn't adequately reflect how their responsibilities have expanded.

We are pleased to see that the College of Policing has carried out research into external advisory groups. It told us that this research was in support of the [Police Race Action Plan](#), and it intends to publish this research in summer 2024. It will then consider whether it needs to make any changes to guidance, taking into account other relevant work, particularly the [Home Office consultation on guidance for community scrutiny panels](#).

The Home Office consultation considered how to improve local scrutiny panels to help police serve communities more effectively. It developed the framework with PCCs, the police and other organisations and community representatives. It recommends national guidance standards for the effective community scrutiny of local public–police interactions by CSPs. This scrutiny will make sure that communities and the police understand each other better.

Although we see both the research and consultation as positive, forces and PCCs will have different priorities. Advice and guidance to both forces and PCCs needs to be:

- relevant to each organisation;
- current; and
- provide a framework of what they need to consider.

[We make a recommendation about this later in the chapter.](#)

National oversight of IAGs

In 2020, IAG members from across England and Wales formed the National Association of Independent Advisory Groups (NAIAG). This national organisation aims to provide guidance, insight and constructive challenge to local forces through their respective IAGs. The NAIAG also aims to gather and share best practice through the network of IAGs. However, none of the force IAG leads or IAG members we interviewed mentioned the NAIAG.

Force oversight and governance

Most forces have a [police officer](#) lead for external advisory groups at a strategic level. But it is often unclear how forces bring together governance and oversight of the separate groups.

Chairing arrangements for external advisory groups varied across forces. We found that the chairs of many external advisory groups are independent from the police. But some panels had chairs who were either police officers or [staff](#), or who were representatives of the PCC.

The purpose of external advisory groups is to give independent advice to forces and scrutinise police activity. When these groups are chaired by police officers or staff, the public's perception of their independence may be adversely affected.

Some forces invited group or panel chairs to either attend or give updates to force strategic management meetings. But this wasn't always the case. This may lead to groups working in isolation and not sharing good practice with the force and other groups.

Terms of reference for advisory groups are often unclear

Terms of reference (TOR) define the purpose and structures of a project, meeting, committee or group. All members of the group should agree the TOR and regularly review and amend them if necessary.

During our inspection, we found that most forces have TOR for external advisory groups. However, the level of detail and frequency of review varied across forces. In one force, we found it had been almost seven years since their last review. We believe that forces should review such TOR more frequently to make sure they remain accurate and relevant.

In our interviews with external advisory group members, we heard that some had been involved with the setting of the TOR, but others were unaware that any were in place. This meant that the role and purpose of the groups were often unclear. Members didn't always understand the group's aims and responsibilities. Forces use such a variety of groups that the roles and responsibilities can be confusing.

Although there are external advisory groups in all forces we inspected, often forces don't have any guidance to say how these groups should be structured or who can join them.

This lack of consistent TOR and governance means that some forces are unclear how they could or should use their external advisory groups to inform operational plans or responses. This may lead to missed opportunities to engage with communities.

We found a good example of clear TOR and governance across external advisory groups in Cheshire Constabulary. The force uses a legitimacy framework to map across and bring the various groups together at a strategic level. Therefore, there is a clear route to raise or escalate issues when needed and gather good practice. The public can see the legitimacy framework on the external website.

[We make a recommendation about TOR later in this chapter.](#)

Recruitment, selection and vetting of external advisors

Recruitment and selection for external advisory groups vary across forces

Methods of recruiting members for external advisory groups vary from force to force. This is understandable as forces have different demographics and priorities.

Some forces and PCCs have formal recruitment processes for external advisory groups. They advertise on external police websites, and interested people submit their applications online. Some forces ask them to provide a CV. Existing external advisory group members, the police or PCC representatives then interview prospective members. Chairs of external advisory groups may also recruit directly, rather than using force recruitment processes.

Many forces try to target this recruitment to represent the diversity of their local communities. This includes using local policing teams to help identify contacts, for example, younger members of the community. In one force, officers had approached a member of the local community who had voiced criticism of a firearms policy. They invited the individual to work with them and help give information back to the wider community. However, many forces struggle to attract the right people and turn to established community groups, for example KINs, to help.

We heard that some neighbourhood police officers and staff weren't clear about who they should invite to join an external advisory group. One sergeant told us that they had been given no guidance about who to recruit. They just did their best to find people who they thought could understand and explain community opinion and reaction.

Often, recruitment is via word of mouth. There is an overreliance on using existing relationships or nominations from some community groups. In many forces, we heard that they ask existing members to identify suitable candidates and invite them to apply. This dependency on self-selection introduces the risk that one perspective will dominate the group.

There is little guidance on recruiting for external advisory groups. This leads to inconsistent and often unstructured recruitment. One group member said: “Each time it is done, it is done differently.”

One set of external advisory group members told us that the force was changing the structure of external groups. Each local policing area needed to form a new group within a short time span. The group members felt that the force just assumed that it could recruit more people, but no one was pro-actively identifying new members. The existing group said that they hadn’t seen any TOR for the new structure. And no one had told them how it would work or explained their new roles.

This inconsistent approach to recruiting external advisory group members means forces can’t assure themselves that the advice provided is representative of the wider community. We make a recommendation about guidance for the recruitment of external advisory group members later in this chapter.

Vetting requirements can be a barrier to external advisory group recruitment

The [Vetting Code of Practice \(Vetting CoP\)](#) and the College of Policing’s [vetting authorised professional practice \(vetting APP\)](#) state that everyone engaged on a permanent, temporary, full-time, part-time, casual, consultancy, contracted or voluntary basis with the police needs vetting to an appropriate level.

We found that vetting of advisory group members varies across forces. Some senior officers told us that vetting external advisory group members can deter some members of the community from applying and can be a barrier to recruitment. For example, one force identified an individual who had been both a [victim](#) and a perpetrator of crime as being someone who could help them to engage with the community. Although the individual had valuable experience, the vetting policy didn’t allow for any discretion or [assessment](#) and management of risk. Therefore, the force couldn’t allow them to join a group and missed an opportunity to use their experiences to help improve force policies and processes.

Some senior officers told us that they couldn’t ask for advice or perspectives from external advisory group members who don’t have vetting clearance. One officer told us: “We can’t go to an IAG due to a lack of vetting, but we do go to vetted partners with community links.”

Some forces take a less intrusive approach to vetting external advisory group members

In contrast, some forces have decided against any formal vetting of members of external advisory groups. Where forces don't vet members, they usually take steps to mitigate any risk that this may pose. These steps include carrying out background checks, asking members to sign a confidentiality agreement and escorting members while they are in police premises. Several [chief officers](#) told us that the benefits of having a wide range of external advisory group members outweighed the risks of them not all being vetted. This approach isn't reflected in the 2015 College of Policing guidance.

We heard from forces that this approach allows members with lived experience to join external advisory groups. This means that forces can hear the voices of individuals who, for example, may have first-hand involvement with the police or direct experience with their communities. Proportionate background checks allow for informed and balanced decisions. These checks will show the level of risk, whether the force can manage it and what risk mitigation it has considered. We agree with this approach.

In 2022, we published our report '[An inspection of vetting, misconduct, and misogyny in the police service](#)'. One of its recommendations was:

“By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should include a vetting decision-making template within the Vetting Authorised Professional Practice, to standardise decision-making.”

In our view, forces would benefit from using this template to record decision-making about the vetting, or non-vetting, of external advisory group members. At the time of our inspection, a draft new vetting APP, containing a decision-making template, was in its consultation phase.

We make a recommendation about guidance for the vetting of members of external advisory groups later in this chapter.

The role of external advisory groups

Not all forces consult their external advisory groups when making policies

We found the extent to which external advisory groups contribute to and influence the development of force policies varied.

We heard positive examples where external advisory groups had helped shape policies and processes. In one instance, a force invited an external advisory group to visit a custody suite. A member noticed that there was information available about the rights for detained people from many different groups, but there was no information available for people who were transgender. They raised this as a concern.

In response, the force produced an additional set of rights and asked the group member to help train custody personnel on those rights.

Case study 5

In West Midlands Police, we heard about a group representing a section of the Black community. The group has close links to the force's diversity, equality and inclusion team and supports the force in its race action plan. It also contributes to the training of officers and staff around Black history and [hate crime](#). The force lead told us that members of this group are important ambassadors for the force, with strong links to the community. Two of them run a local radio station and often promote the work of the police to a wide-ranging and diverse audience.

We also heard that one force consults its strategic independent advisory group (SIAG) on all its new or revised policies or processes. It sends policy documentation and the draft [equality impact assessment](#) to the SIAG members for consultation and comment. The force collates responses from the SIAG members, together with comments from other consultees, and uses them to revise the policy as necessary before the force approves it.

However, not all forces draw on their advisory groups in this way. Some external advisory groups felt excluded from how forces developed policies. We heard that one force previously consulted the external advisory group on force-wide policies. But members told us they no longer have any engagement with the force policy lead.

We heard from another force's external advisory group that officers and staff hadn't approached it to advise on the force's hate crime and non-crime hate incident reporting policy and processes. The force didn't turn to the group for help in implementing these policies or training staff.

This lack of engagement and consultation means that forces may miss the voice of those communities who may be affected by changes to existing or new police policies.

The way forces use external advisory groups to provide scrutiny of police powers varies

In December 2023, the '[Report on the Criminal Justice Alliance's super-complaint](#)' stated that all the forces visited as part of that investigation had an independent panel for stop and search scrutiny. The investigation found community scrutiny groups typically received strong support from forces and local policing bodies in relation to administration and the provision of data. It also found that panel names, formats, TOR, practices and processes varied greatly from force to force. This resulted in widely inconsistent approaches and outcomes in a range of areas.

We found the same inconsistencies in this inspection. Many forces have established scrutiny groups to review and advise on how they use stop and search, the response to hate crime and the use of force.

These forces told us that they brief their scrutiny groups about selected incidents and show them recordings of the incidents from police body-worn video cameras. The discussions that follow often provide an opportunity to challenge difficult issues and lead to a review of working practices.

Many forces use external advisory groups to reassure communities

External advisory group members can help police reassure communities during or after [critical](#) and major incidents.

During our inspection, we heard many examples where the engagement with external advisory groups had worked well in relation to such an incident.

In a focus group with members of an external advisory group, we heard that the force had approached the group following the death of a young [child](#). Another force invited its external advisory group to attend a briefing following a murder in its community. In these examples, the use of the external advisory groups enabled a timely two-way flow of information between the community and the police.

A member of a staff network told us how well its force used external advisory groups during critical incidents, helping the police to understand community tension or concerns. They told us that, following a death in the community, the external advisory group's advice was "really sound and made out, and not always what you wanted to hear". But the advice meant that the police considered their response and didn't make assumptions about what communities need to feel reassured.

However, some external advisory groups felt that forces didn't use them enough. This included during some high-profile incidents. This means that some police forces miss opportunities to share information, take advice and reassure communities.

There are benefits to getting community advice on planned events

When policing an event, forces frequently make good use of external advisory groups at the planning stage, during and after the event. We heard examples where the police had engaged with community groups to develop the police response. This helped the wider communities to understand what the police were aiming to achieve.

In particular, we found this with public order policing. Many forces use several external advisory groups, as well as community representatives and staff support networks to advise at the planning stage and during the event. For example, forces engaged with external advisory groups and staff support networks during the Israeli and Palestinian protests.

During Eid events, one force had invited external advisory group members into the command suite. Members were then able to share information back to the community.

We heard that one force has a football external advisory group that supports the police on some of their tactical decisions. It also shares information with football supporters, including explaining why a police presence is needed. One police lead said:

“IAG members can sometimes be the best TacAds [tactical advisors].”

But not all groups felt that the police consult them enough before events. One external advisory group said they hadn't received any engagement around events or protests, including Black Lives Matter or Pride. This means group members had little opportunity to talk with their communities and advise the force of any concerns.

External advisory groups aren't always representative of local communities

We found that external advisory groups are rarely a true reflection of local communities. Forces recognised that there are gaps in representation. Many interviewees told us that external advisory groups attract those with the time and inclination to support such roles. Many of these people are already engaged with other public service groups. Forces often struggle to attract people with a variety of lived experience to their advisory groups. One senior officer said that external advisory groups need to attract more diverse members.

In one force, the lead for the external advisory group told us that the local community had areas of deprivation. But membership of the group wasn't representative of its community as the group's members were mainly White, male, older professionals from an affluent background.

One interviewee told us that external advisory groups consist of well-meaning, hardworking volunteers, but they aren't necessarily representative enough. They said that the views members of these groups provide remain important, but the police should consider them within that context.

Some forces had targeted recruitment towards people with specific [protected characteristics](#) or from certain communities. However, retaining members can be difficult. Some lost interest; others withdrew from the group because of changes to their lifestyles so they no longer had time for this commitment. This highlights that recruitment needs to be an ongoing process.

Lack of representation across some groups means that there is little, or no, opportunity for some communities to advise, support or challenge the decisions affecting them.

Many of the forces we inspected recognise that they still have work to do to create a balanced representation of their communities. The police can benefit from understanding the experiences of people. It is important to listen to communities, but it is also important that forces don't defer to those who may only represent one section of the community. Individuals who are members of external advisory groups rarely represent the whole of the local community and may not have a balanced view. It is for forces to understand and consider their collective views when making decisions.

External advisory groups aren't always independent

We found that most forces don't review the membership of external advisory groups. Some external advisory group members have been in post for a long time. In one force, an external advisory group had only six members. Two had been part of the group for 19 years, and one was a retired police officer. One police lead told us:

“To remove people who have invested so much time in the force and their community would have been difficult and not the right thing to do. They still have a voice.”

A chief officer in one force told us there was a risk of some long-standing members developing a comfortable relationship with the force and becoming less willing to challenge it. We believe that a tenure policy for all members of external advisory groups would help to make sure that these groups remain independent, representative and effective.

Members of one external advisory group were concerned that local councillors were also members of that group. The interviewees questioned the councillors' independence.

We found that many forces rely on the same individuals to participate in multiple external advisory groups. This may affect the diversity of views they present. Membership should evolve to reflect changes within the local community.

Most external advisory group members are volunteers, and the force doesn't pay them, although most can claim expenses, such as transport and car parking. However, a few forces pay the chair and some members. One external advisory group member said that while money isn't the primary motivation, it could potentially help to recruit and attract a more diverse group. They said that not everyone can give up their time for free if they are trying to balance work and volunteering.

In an interview with external group members, we heard that relying on people who volunteer to freely give up their time may restrict membership to those who aren't working or who are retired. This excludes potential members who may have caring responsibilities. We found that one force pays an hourly carer's allowance to cover the care of dependants when a member is attending a meeting or undertaking a police duty.

One force was concerned that payment may also mean that [volunteers could be entitled to certain employment rights, for example, a minimum wage](#). The rewards to external advisory group members, whether payment or something else, need to be clear and consistent. In our view, payment, other than to compensate for reasonable expenses, calls into question the independence of the role of advisory group members.

[We make a recommendation about guidance relating to reward, payment and expenses for external advisory group members later in this chapter.](#)

Forces can overcome gaps in advisory group representation

Although forces often struggle to recruit to external advisory groups, we found that they can effectively engage with communities to fill any gaps.

We heard many examples of positive engagement. For example, in a force with a large Eastern European community, a local officer has developed strong links with respected individuals within that community. This means that they can share information both ways: from the police to the community and vice versa.

Forces often find it challenging to recruit young people to external advisory groups. Cheshire Constabulary told us it has responded to that challenge by engaging with the Cheshire Youth Commission to gain insight into the impact of stop and search on local young people. The Youth Commission reviewed the force's stop and search training and gave feedback on the language and terminology used. Other forces had used their wide and diverse cadet force as a youth panel for consultation, or they engaged with young people from local colleges.

Forces often approach partner organisations, such as local authority networks, to help them engage with communities. An interviewee gave us an example of their local authority putting the force in touch with a community member. This helped the force when it found out about potential disorder at an upcoming football match. Through the local authority contact, the force could gauge the level of local tension and create a conduit for information.

Even when external advisory groups consist of individuals who represent all visible protected characteristics, there may be less-visible communities that aren't involved with an advisory group. One force told us that it uses the community safety partnership to help it to engage with such communities.

Training of advisory group members is inconsistent

During our inspection, we found that the training of external advisory group members is inconsistent. Many forces didn't have an initial training package for either external advisory group members or for police officers and staff who engaged with these groups.

Some forces provided an oral briefing to group members; however, this isn't always the case. One interviewee said that at their first meeting, they received no explanation of their role and no information about what the force expected from them.

We found that several forces provide members with a handbook, detailing their role and responsibilities. We noted that in one force the handbook also includes practical guidance on topics such as confidentiality, contact with the media and conflicts of interest. Some forces provide training sessions on specific themes or topics. This was primarily around stop and search and the use of police powers. A small number of forces have offered group members the opportunity to visit local policing teams and to observe training. Sometimes members accompany police patrols to observe officers using their [stop and search powers](#). This helps members to understand the use of policing powers and processes. But forces organise these sessions at a local level on an ad hoc basis. Where forces provided training to their group members, they didn't always refresh or update it.

One force lead expressed uncertainty as to whether external advisory group members should have formal training. They saw the role – in this case the IAG – as advising the force using their lived experience and engagement with the community. They said that training may prejudice their views.

Forces should consider what training external advisory groups need, depending on their purpose. Agreed minimum standards of training would reduce confusion and give the group members the confidence to scrutinise and challenge police policies and processes.

Throughout this chapter we have made a number of observations that we now cover in an overarching recommendation.

Recommendation 15

By 31 March 2025, the [College of Policing](#) should publish new guidance on the role and use of external advisory groups, taking into consideration the results of its research and other relevant work. As a minimum, this should include guidance on:

- terms of reference;
- selection and role of the chair;
- vetting or other appropriate security measures;
- recruitment, selection and tenure of members;
- reward, payment and expenses; and
- training.

Most police officers and staff understand the reason for external advisory groups

In our call for views, we asked police officers and staff if they thought that seeking the views of all community groups helped the police serve the public. A total of 76 percent of respondents thought that this was helpful, and only 7 percent said that it was unhelpful, with 17 percent saying that it was neither helpful nor unhelpful.

We also asked whether respondents thought that seeking the views of all community groups helped the police to be impartial. A total of 74 percent thought that it was helpful, 8 percent thought it was unhelpful and 18 percent said it was neither helpful nor unhelpful.

But not everyone agrees. We saw limited evidence that some police officers and staff don't always understand the purpose and value of independent external advisory groups. In a focus group with response officers, one interviewee told us that, although the force used external advisory groups well, some officers viewed them as having their own agenda and therefore not impartial. The interviewee said:

“Their agendas don't necessarily align with the impartiality needed in policing.”

Another interviewee added:

“Are we giving power to people who are not in a democratic position, who have their own agendas?”

Forces should make sure that police officers and staff understand the role and value of external advisory groups.

External advisory group members often feel undervalued

Many members of external advisory groups told us that feedback was important to them. They liked to know how their advice had influenced actions, change or improvement.

Some advisory group members believed that their forces valued their input. These forces were willing to listen to members' concerns and provide updates. Some groups use action trackers during their meetings and only mark these off as complete when they are satisfied that the force has taken action. One force has a standing agenda item of “You said, we did”. This makes sure that the force always gives feedback and updates on any advice or actions agreed at previous external advisory group meetings.

Some officers and staff told us that they see it as positive when advisory groups participate in operational debriefs. Forces use these discussions to help understand what worked well, and where they can improve.

But we heard that some external advisory group members felt undervalued and underused. This has made some members consider leaving. They found engagement with the force about policies or processes was selective and haphazard. Members felt this reduced their ability to provide meaningful and consistent feedback.

In a focus group with external advisory group members, we heard some concerning comments. These included:

“Police support and use of the IAG has been woeful.”

“I don’t think that we are listened to.”

“We as a group are just thrown to one side.”

Forces don’t always take minutes and actions during meetings with external advisory groups. This means that there is no record of discussion or decisions. One group felt that external advisory groups were a tick-box exercise. They felt their role was just as an audience to give presentations to.

In one focus group, members told us that although senior officers attended the IAG chairs’ meeting and presented on what the force is doing, the senior officers rarely took away any actions. Even when they did, the IAG chairs didn’t get updates on those actions.

In our view, where forces used their external advisory groups well and gave them a clear focus and positive engagement, the members felt valued and listened to. The forces benefited from the advice the external advisory groups provided to inform decision-making. Once the College of Policing has published its new guidance, all forces should follow it to make sure they use their advisory groups effectively.

6. Non-crime hate incidents

In this chapter, we describe the background concerned with non-crime hate incident recording and examine the effects that recording such incidents has on operational policing.

[The Home Office's code of practice relating to non-crime hate incidents \(NCHIs\)](#) defines an NCHI as:

“an incident or alleged incident which involves or is alleged to involve an act by a person (‘the subject’) which is perceived by a person other than the subject (‘the complainant’) to be motivated – wholly or partly – by hostility or prejudice towards persons with a particular characteristic.”

Legislation, guidance and processes relating to NCHIs

The origins of non-crime hate incident recording go back to the Stephen Lawrence Inquiry

In the [Stephen Lawrence Inquiry report](#), Sir William Macpherson recommended that the following should be used as the universal definition of a racist incident:

“A racist incident is any incident that is perceived to be racist by the victim or any other person.”

The report also included a recommendation that the police should record, and investigate equally, racist incidents that constitute crimes, and those that don't. This has since expanded to include all the [protected characteristics](#) covered by [hate crime](#) laws in England and Wales.

Additionally, the inquiry also suggested developing codes of practice that would provide “a comprehensive system of reporting and recording all racist incidents and crimes”.

National guidance on NCHIs has developed since the year 2000. This includes ‘The Guide to Identifying and Combating Hate Crime’ in 2000 and ‘Good Practice and Tactical Guidance on Hate Crime’ in 2005. In 2014, the [College of Policing](#) published its ‘Hate Crime Operational Guidance’ (HCOG), which included NCHI guidance. These documents are no longer in use and have been superseded.

A case in 2020 led to a change in guidance for how police deal with NCHIs

In 2020, the [Miller case](#) challenged the College of Policing in relation to the content of the HCOG in the High Court. The case included the argument that as a policy, the HCOG violated domestic law and Article 10 of the [European Convention on Human Rights \(ECHR\)](#), which protects freedom of expression. The court's decision was that the HCOG was lawful as a policy under domestic law and under Article 10.

Following this case, in October 2020, the College of Policing published the [hate crime authorised professional practice \(APP\)](#).

In 2021, the High Court judgment was appealed to the Court of Appeal in [R \(Miller\) v College of Policing \[2021\] EWCA Civ 1926](#) which considered two areas regarding the lawfulness of elements of the HCOG. In particular, police must record NCHIs based on the perception of the [victim](#), without considering whether there is any evidence to justify the complaint. And it also considered that parts of the HCOG were contrary to the right to freedom of expression at common law and as protected by Article 10 of the [ECHR](#).

The Court of Appeal established that the HCOG didn't provide forces with the discretion to record or to not record an NCHI. By not allowing discretion, the guidance sanctioned, or positively approved or encouraged, conduct by forces that would violate Article 10 of the ECHR. It also failed to strike a proportionate balance between the Article 10 rights and interference with those rights. The court deemed the existing guidance unlawful and a disproportionate interference with Article 10 as it didn't constitute the least intrusive method for dealing with such matters.

Following the Miller case, in June 2023, the then Home Secretary issued '[Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data](#)' (the Code), in accordance with the power provided in sections 60–61 of the [Police, Crime, Sentencing and Courts Act 2022](#). This code of practice adopts a different approach to that of the HCOG. While continuing to support the recording of NCHIs, it creates separate categories of NCHIs, which depend on whether or not the subject's personal data is in the record. The Code also states that those dealing with NCHIs should refer to the person making the complaint as the "complainant", and the person being complained about as the "subject", rather than "victim" and "suspect".

In 2023, the College of Policing updated its [hate crime APP](#), including a section about [Responding to non-crime hate incidents](#).

Differences between the NCHI Code of Practice and the Equality Act 2010 can cause confusion

The particular characteristics detailed in the Code that are included in hate crime legislation are:

- race;
- religion;
- disability;
- sexual orientation; and
- transgender identity.

Where considered necessary, forces may also extend this to cover incidents involving other characteristics that the hate crime legislation doesn't cover.

It is worth highlighting that the particular characteristics covered by the hate crime legislation are different from the protected characteristics covered by the [Equality Act 2010](#), as outlined in chapter 2. The Equality Act 2010 doesn't have a protected characteristic relating to transgender identity. But it does have additional characteristics of:

- age;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- belief; and
- sex.

Hate crime recording legislation refers to [section 28\(5\) of the Crime and Disorder Act 1998](#) when defining religion or religious belief. This doesn't include any of the other beliefs beyond those that are religious. Therefore, it is another example of inconsistencies in hate crime legislation and NCHI guidance when compared with the Equality Act 2010.

This can lead to confusion for officers and staff when deciding whether to record a hate crime or an NCHI.

There is inconsistency in the way forces have responded to the new guidance

There are significant differences in the extent to which forces have responded to the Code and the NCHI APP.

All 12 forces we inspected told us they were aware of the Code and NCHI APP, and that they had either adopted this APP or were working towards adopting it. However, we found significant variations in how forces had responded and the actions they had taken.

Some forces had introduced, or were introducing, structured processes for recording NCHIs. Others had amended force policies but hadn't fully implemented the changes. In three forces there had been no noticeable response, with one force simply circulating the College Learn online training material to officers and staff, with little, if any, monitoring of completion rates.

Force policies don't always provide clear direction about the processes for dealing with NCHIs

During our inspection, we reviewed force policies to assess how effectively they provide clear direction for NCHI processes. This included any changes or updates introduced following the Miller case, the introduction of the Code and the revised NCHI APP.

Policies in five forces pre-dated the Code and NCHI APP. This meant the direction and guidance provided to officers and staff in these forces weren't up to date. And in the remaining forces, policies weren't always clear. For example, some policies didn't clearly define the specific responsibilities of officers and staff and the processes for recording, assessing and responding to NCHIs. This meant that some working practices didn't align with policies, leading to inconsistencies in how forces dealt with NCHIs.

Recommendation 16

By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

The recording of hate-related incidents, and the ability to retrieve data, is a significant challenge in some forces

The purpose of the Code is to help police officers and staff make decisions about the recording and retention of personal data relating to NCHIs. The Code also sets out the approach forces should take when deciding whether to record an NCHI. It emphasises that forces should apply a common-sense approach that considers upholding the right to freedom of expression. The Code states that following the initial assessment, if the force determines that it should record an NCHI, there are two options for how it can do this:

- an NCHI record that only includes non-personal details of the person who is the subject of the complaint, and may include details of the location and circumstances of the incident; or
- an NCHI record that also includes the personal details of the subject of the complaint.

In either option, personal data of the complainant may be included for normal police recording purposes.

The Code also states that forces should only record personal data:

- where they deem that there is a real risk of significant harm to individuals or groups with a particular characteristic(s); and/or
- a real risk that a future criminal offence may be committed against individuals or groups with a particular characteristic(s).

We discuss the recording of personal data later in this chapter.

[As described in the introduction](#), we completed a case file review of 120 NCHI cases. We asked forces to give us details of cases they had recorded as NCHIs. This included incidents that forces initially recorded as NCHIs, and later reclassified as hate crimes.

When someone reports an incident to the police, it is recorded on force systems using an opening code. The opening code identifies to forces the type of incident that has been recorded and helps them to retrieve data from their systems. But there are no nationally prescribed incident opening codes. This has led to forces developing their own. This means there are significant variances in the opening codes used to record hate incidents and how forces describe hate incidents on their systems.

We found that some forces initially use different codes and descriptions to record, and subsequently finalise, similar types of incidents. This means that it was difficult for forces to identify NCHIs or differentiate between NCHIs and hate crimes. Forces couldn't always provide us with the specific data we requested. Forces that can't obtain this data can't effectively analyse hate incidents to get a thorough understanding of them.

Recommendation 17

By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to [hate crimes](#) and non-crime hate incidents.

Some forces don't effectively assess reported incidents, resulting in incorrect recording and inefficient deployment

The NCHI APP provides a framework for recording and responding to NCHIs. The process sets out five key steps:

- gathering information;
- assessment of incident;
- referral for deployment and/or review;

- review; and
- retention of police information.

In this report, we refer to the responsibilities of call takers. But as well as incidents reported by telephone, we include incidents reported by other methods, such as online or directly to police officers or staff.

In accordance with the Code and NCHI APP, when gathering information about the incident, the call taker should gather and consider any supporting information. This can include previous incidents in the same location, or involving the same complainant, subject or target group.

The NCHI APP states that call takers shouldn't directly challenge the complainant's perception of hostility, but should investigate why the complainant holds this view. In our case file review, we were pleased to find that in all applicable cases, call takers had followed this guidance.

The NCHI APP also states that during the assessment stage, when deciding whether to record the incident as an NCHI, with or without personal data, call takers should assess whether the complainant's perception of hostility or prejudice is reasonable. To achieve this, the NCHI APP states that call takers should consider whether:

- the complaint is trivial, irrational or malicious;
- the incident relates to school-aged children on school premises; and/or
- the incident relates to freedom of expression, and the subject is expressing lawfully held views.

If the circumstances meet any of these criteria, forces shouldn't record the incident as an NCHI.

We often found that call takers hadn't received training about NCHIs, and had limited, if any, knowledge of the Code or NCHI APP. They didn't always consider relevant factors, thereby reducing the effectiveness of the assessment. This meant that forces sometimes missed the opportunity to identify incidents as NCHIs, and consequently dealt with them in the same way as crimes or other incidents.

Forces may deploy resources unnecessarily to NCHIs

The NCHI APP states that, when considering whether to deploy police resources in response to the reported incidents, call takers should consider proportionality, lawfulness, accountability, necessity, and ethics. The NCHI APP uses the mnemonic PLANE to refer to these considerations. This should make sure that forces deploy police resources only where necessary and with the appropriate grade of response.

We consistently found a lack of knowledge of the requirements of the PLANE process, with no evidence recorded on force systems to indicate that call takers had considered it. The lack of knowledge of NCHIs and the absence of the PLANE process mean that forces may deploy resources unnecessarily.

For example, in one case the complainant had difficulty walking and an unknown person asked them why they weren't using a wheelchair. The complainant thought this was related to their disability. Following an assessment in accordance with the NCHI APP, the call taker perceived the matter as being trivial, irrational or malicious. This means that the force shouldn't have recorded this matter. However, despite this assessment, the force incorrectly recorded this as a public order crime and unnecessarily deployed uniformed officers to investigate. The force finalised this matter as a crime with no suspect identified.

In another case, a force received an online report that a ten-year-old [child](#) had made a racist insult on school premises to another child of the same age. The parent of the child who was insulted was happy for the school to deal with this matter internally. In accordance with the [Home Office Crime Recording Rules](#), the NCHI APP and the Code, the force shouldn't have recorded this as a crime or an NCHI, as it was suitable for the school to investigate. The school subsequently investigated the matter and organised racism awareness sessions for pupils. The force had incorrectly recorded and finalised the matter as a racially aggravated public order crime and unnecessarily deployed uniformed officers to the home address of the complainant.

This wasn't an isolated case. Of the 120 cases we reviewed, police incorrectly recorded seven incidents on school premises as crimes or NCHIs.

Call takers may not be best suited to make this complicated assessment

The NCHI APP gives guidance to forces on the steps they should take in respect of NCHIs. We found that forces sometimes adapt this guidance and apply it in line with the different crime and incident recording systems and processes they operate.

For example, unless there was an immediate risk or [safeguarding](#) concern, some forces we inspected had taken the assessment responsibility away from the call taker. Leicestershire Police had placed supervisors with specialist hate crime training in the control room. Supervisors triage each report of a hate incident and advise the call taker whether to record an NCHI or otherwise.

Northumbria Police has a specialist team who carry out daily checks to make sure all NCHIs and hate crimes have been categorised correctly. This team then complete a combined assessment and review to determine what to do next with the information. They then decide if there is a need for any deployment or specialist advice.

Those forces in which hate crime specialists, rather than call takers, carry out the assessment and review told us that this achieves greater scrutiny and improves assessments. This is likely to provide a better service to the public and increase the

accuracy of incident recording. The role of a call taker is often challenging, with competing demands. Call takers may not have the capacity, knowledge and experience to make this complicated assessment. Some interviewees told us that the NCHI APP places this responsibility too heavily on call takers. We agree.

Force review processes for NCHIs and hate crimes don't always provide effective scrutiny

The NCHI APP states that in cases where the call taker has completed an assessment and recorded an NCHI, except in cases where there is an immediate risk of harm, they should refer the incidents for review by officers or staff with specialist knowledge. Examples of such officers and staff would be those working in community cohesion teams, diversity and inclusion teams or hate crime teams.

These reviews should reflect the process in the original assessment. This includes consideration of the characteristics of those involved, and consideration of PLANE to determine if the force should deploy resources. These reviews should assure the force that it:

- is using the correct codes to record the incident;
- closes incidents identified as trivial, irrational, and malicious; and
- deletes personal data that it has recorded without a lawful basis.

We found significant variations in when, or if, forces completed the review process. Forces which had more effective processes reviewed incidents within 24 hours to determine whether to record the matter, and whether to deploy officers.

Some forces recorded incidents as hate crimes or hate incidents and routinely deployed resources or allocated incidents for investigation. But they did so without considering whether the incident was an NCHI, and without completing a review.

Other forces recorded incidents and allocated resources to attend or contact the complainant before the specialist's review. Officers or staff won't need to attend every incident, so this is an ineffective and inefficient use of resources.

Recommendation 18

By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

A risk-averse approach and lack of knowledge has led to incorrect recording of some hate crimes and NCHIs

Due to the scrutiny around crime recording and any failures to record crimes, we found that some officers and staff adopt a risk-averse approach. They simply record the incident as a crime rather than consider whether it might be an NCHI or whether no further record is needed.

One officer told us that, due to fear of being criticised or reprimanded for failing to record a crime, “it is easier to record a crime and not get criticised for non-recording”. In another force we heard about a culture of “if in doubt, record a crime” which some leaders encouraged.

We found that when officers attended incidents that the force had incorrectly recorded as a hate crime prior to their arrival, sometimes they finalised the crime as “undetected”. This was due to a lack of knowledge of the difference between a crime, an NCHI and an incident that is neither. Officers and staff in some forces also perceived the crime cancellation processes as challenging. This has created a reluctance to cancel crimes, even when it is appropriate to do so. One officer stated:

“Once a hate crime ... always a hate crime.”

A risk-averse culture and lack of knowledge among officers and staff contributes to unnecessary and incorrect recording of NCHIs and hate crimes. During [our case file review](#), we found that of the 120 cases we reviewed, forces had recorded 16 NCHIs and 14 hate crimes when there was no requirement to do so.

In one case, a man reported that other passengers on a bus had given him “funny looks” due to his ethnic appearance. The call taker didn’t consider whether the matter was trivial, irrational or malicious, and may have unnecessarily recorded a NCHI.

In another case, a man reported that when he had tried to deposit a large amount of cash at a bank, staff, following anti-money laundering protocols that apply to all customers, questioned the origin of the money. The complainant took exception and became angry as he believed this was due to his ethnicity. Although the matter related to banking processes, the force initially recorded it as an NCHI. Following investigation, the officer dealing with the case concluded that it shouldn’t have been recorded and that the force should close the matter. However, a crime reviewer later incorrectly reclassified it as a racially aggravated public order offence, committed by bank staff. Eventually, after a further review, the incident was declassified as a crime.

The Home Office issued the Code and the College of Policing issued the NCHI APP three months before our inspection. We recognise that implementing changes can be difficult. Providing personnel with the required training and making sure that effective working practices and processes are accepted and understood by everyone can take time. However, this doesn’t mean that forces should be complacent in their response. Creating or updating force policies regarding NCHIs is a step in the right direction. But forces must also make sure that they have effective systems for assessing, reviewing and responding to reports of NCHIs and hate crimes. They should also have clearly defined individual roles and responsibilities, and effective governance arrangements.

Training and guidance

Some officers and staff found training relating to NCHIs confusing

The College of Policing provides online training in relation to dealing with NCHIs. The training includes a process flowchart for recording such incidents. The flowchart is designed to help officers and staff to decide when to record NCHIs and when to delete a person's personal details.

The online training reflects the result of the Miller case and the content of the Code. We found that forces had taken different approaches to their training. Two forces, Northumbria and Leicestershire, had reviewed the training and supplemented it with their own bespoke material.

Police officers and staff of varying ranks and grades, and lengths of service, who had completed the online NCHI training often described it as difficult, confusing and not easy to understand. They said it failed to provide a clear context. For example, it didn't clearly describe the difference between a crime and an NCHI.

One officer stated that he "found e-training confusing and changes difficult to understand". During our fieldwork, one of our inspectors completed the online NCHI training. They agreed that this training was confusing.

We found that responding officers and staff often lacked confidence or an adequate understanding of what defined an NCHI or hate-related crime. This included some who had completed the online NCHI training. Officers, staff and their supervisors often told us that they were unclear about what constituted an incident or crime. They were also unclear about what behaviours capable of causing offence might amount to lawful "freedom of expression".

In one force, a [chief officer](#) told us about a case that highlights how difficult some of these decisions are for officers and staff. At the time of our inspection, an incident involving the display of a sign relating to the conflict between Israel and Palestine had been debated for 30 minutes by the [force crime registrar](#) and the chief officer. It was only after this lengthy debate that they decided not to record an NCHI.

The limitations of the training on the Equality Act 2010 described earlier in this report compound the lack of understanding of NCHIs. Taken together, the training provided doesn't adequately develop and inform personnel when dealing with the protected characteristic of belief.

This subject is complex. Some of those we spoke to believed that a blended approach to training was best. They thought it should include face-to-face and group learning to allow discussion and debate about relevant issues. We agree.

The College of Policing online training provides officers and staff with a foundation level of knowledge. Forces have a responsibility to make sure that personnel have sufficient knowledge in these areas. They should provide additional learning opportunities and resources where required.

Recommendation 19

By 31 July 2025, the [College of Policing](#) should work with forces to evaluate and improve the effectiveness of non-crime hate incident training. This should include consideration of the most effective methods of providing this training.

Retention and redaction of personal data

Forces can get valuable information and intelligence from recorded NCHIs

In all forces, we heard that NCHIs provided valuable [intelligence](#). We saw that forces used the intelligence effectively, to identify [vulnerable people](#) and individuals being victimised. This can also help identify people who, while not victims of crime, may need safeguarding or referral to support services.

The recording of NCHIs helps forces to identify, assess and respond to threats and risk, and to investigate when required. This could include “course of conduct” offences such as [harassment](#).

Some forces also told us they use NCHIs as an indicator of any cumulative tensions in a community. NCHI reports allow monitoring of trends or individual patterns of behaviour. And they help to identify potential hotspots, which informs intelligence assessments. These assessments influence policing activities such as daily management meetings, patrol plans and crime reduction activities. Forces also share this NCHI intelligence with partner organisations, such as local authorities. This can raise awareness about the prevalence of hate incidents and promote community engagement and cohesion.

Officers and staff of various ranks and grades were worried they would lose this source of intelligence if they had to delete a person’s personal details. And they were concerned about the challenges of gaining intelligence from information that had been subject to some form of deletion. For example, if the subject had been involved in many NCHIs and their details hadn’t been recorded, the force couldn’t link repeated incidents to that person.

Intelligence from NCHIs can help the police to identify emerging issues at an early stage, thereby preventing escalation and the potential effect on trust and confidence in policing.

Forces view the removal of NCHI records and personal data as challenging and unnecessary

The Code requires that in certain cases forces should delete records of NCHIs or personal details in NCHI records. This includes NCHI records created before the Code was introduced, if it is determined that the force shouldn't have made these records. It also includes NCHIs where forces have recorded personal details without meeting the relevant threshold of a real risk of significant harm.

As mentioned earlier in this report, there are two ways of recording NCHIs. Some records only include non-personal data. But if the incident reaches the threshold of a real risk of significant harm, the record can include the personal details of the subject of the complaint.

We found that most forces experienced considerable challenges in deleting information from their command-and-control systems. These systems are designed for the security and integrity of data, and any deletion could potentially compromise this. With the exception of two forces, officers and staff told us they can't effectively delete these records without upgrading systems and allocating specific personnel to do this. This would involve significant cost and resourcing.

Before the Code was introduced, legislation already covered the requirement to remove unlawfully held data from police systems. So this function should already be built into force processes and systems.

There is a wide range of other police data recording systems that may require deletion of personal data. This can include:

- records of calls;
- records and documentation created by responding or investigating officers and staff;
- body-worn video;
- internal communications; and
- emails from the public.

While this isn't an exhaustive list, it indicates the potential scale of the task. During force and national interviews, we found there was uncertainty as to which force systems should have personal data removed.

In March 2024, after our fieldwork had concluded, we were pleased to find the [National Police Chiefs' Council \(NPCC\)](#) had issued guidance to forces about the retention and deletion of personal data.

There is a higher threshold for recording personal data in relation to non-crime hate incidents than other non-crime incidents

Most forces told us they already complied with recognised safeguards in relation to how they deal with information. This is covered by an existing framework of legislation, including:

- the [Data Protection Act 2018](#);
- the [Police Act 1997](#);
- common law; and
- the [police information and records management code of practice](#).

Some interviewees told us that the threshold in the Code for NCHIs for the recording of personal data sets a higher bar than the thresholds in the existing legislation and common law. For example, there is no requirement to consider a real risk of significant harm when recording personal data in relation to other non-crime incidents, such as [antisocial behaviour](#). These interviewees said that the requirements for the higher threshold for NCHIs were unnecessary.

We recognise that forces may adopt an approach for recording and retaining information in accordance with the existing legislation, which may differ from the Code. It is important that, if doing so, forces have regard to the Code and can explain their rationale for taking a different approach.

Recommendation 20

By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from '[Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data](#)', the force should record the rationale for this.

7. Staff networks

In this chapter, we consider the extent to which police staff support networks affect police impartiality or the appearance of impartiality. In doing so we will outline the history of networks; that is, the various national and local groups or associations set up to support [police officers](#) and [staff](#). We will also consider their purpose, role and governance arrangements.

The role and governance arrangements for staff networks

Staff support networks are different to the statutory associations and unions that operate within policing

Networks shouldn't be confused with the statutory staff associations and unions that represent police officers or police staff. Police officers aren't employees; they are Crown servants. They don't share the same rights as other employees, and the following staff associations represent them:

- Police Federation of England and Wales;
- Police Superintendents' Association; and
- Chief Police Officers' Staff Association.

Police staff are employees, and they can choose whether they wish to have representation by joining a trade union. There are several trade unions that operate in support of police staff:

- [Unison](#);
- [Unite](#);
- [GMB](#);
- [Public and Commercial Services Union](#); and
- [Prospect](#).

In addition to the statutory staff associations and unions, there are many other groups within policing that work to support officers and staff. Generally, they aim to improve the terms, conditions and working environment for those they represent, and to improve policing for the benefit of the public.

Staff networks aren't a new phenomenon

In 1883, the Christian Police Association (CPA) became the first recognised police support group in England and Wales. A legacy of the CPA is the three [police treatment centres](#) that provide physical rehabilitation and mental health support to officers and staff.

The police response to the racist murder of Stephen Lawrence in April 1993 led to widespread public accusations of institutional racism within policing. In 1994, responding to similar concerns from officers and staff about racism within the Metropolitan Police Service, with the support of the then Home Secretary Jack Straw MP, the Metropolitan Black Police Association was formed. In 1998, and with the same political support, the National Black Police Association was formed.

We have said in many of our previous reports that policing by consent requires a service that represents the community it serves. Despite some significant improvements, the police need to do much better in attracting, recruiting and retaining officers and staff from diverse backgrounds. Staff networks have an important role in helping forces make these improvements.

Governance arrangements for staff networks aren't consistent

There has been a significant growth in the number of staff networks in policing. In total, there are more than 200 networks across forces in England and Wales. Some of these are local branches of national networks, and some are unique to a force. Many of them align to the different [protected characteristics](#) in the [Equality Act 2010](#). Some do not.

At the time of our inspection, there were 11 networks operating at a national level that were recognised by the [National Police Chiefs' Council \(NPCC\)](#). These networks provide leadership and support to local branches within forces. These networks, and the dates they were formed, are:

- Christian Police Association (1883);
- British Association of Women in Policing (1987);
- National Black Police Association (1998);
- Jewish Police Association (2001);
- National Association of Muslim Police (2007);
- National Police Pagan Association (2009);
- Disabled Police Association (2012);
- Gypsy Roma Traveller Police Association (2014);
- National Police Autism Association (2015);
- National LGBT+ Police Network (2015); and
- National Sikh Police Association (2019).

National networks come in a variety of formats. For example, the Christian Police Association, the National Black Police Association and the National Sikh Police Association are all registered charities. The National Association of Muslim Police Officers is a community interest company. In this inspection, we spoke to more than 50 network representatives and leaders.

The structure and oversight of these national networks aren't consistent. The larger, more established networks have a formal constitution. They also have a leadership structure that includes democratically elected members. Some of these are serving police officers and staff. The respective chief constables usually agree to pay the salaries of officers and staff who have full-time roles in national networks. Those not in full-time positions carry out their network role in addition to their full-time responsibilities.

We spoke to some senior police officers who shared concerns about the inconsistency in the governance arrangements for national networks. They said that some of the larger networks operated almost independently from either forces or the NPCC. Others are led by a [chief officer](#) and have clear roots within the NPCC governance structures.

The NPCC has a small budget to support national networks. The budget is provided as a result of one-off funding and isn't likely to be replenished. The NPCC allocates these funds upon the submission of individual business cases. Many of the networks also benefit from funding through different channels. The funding supports the work they do, both in policing and in local communities. To provide transparency in their finances, some of the networks have acquired charitable status. We reviewed the available public records of these. At the time of our inspection, some of these networks hadn't complied with the Charity Commission for England and Wales annual reporting rules. All organisations associated with policing must demonstrate high standards at all times or otherwise risk damaging public trust and confidence.

Staff network activity could lead to a perception that they aren't impartial

Government and policing policy-makers sometimes consult the national networks. Many of the networks acknowledge this important role in their terms of reference. Some national networks have made public their views on government policy. These included views on immigration, counter-terrorism policy and the use of language relating to Islam. Not everyone agrees; while some observers viewed this as political lobbying or campaigning, others we spoke to interpreted it as legitimate policing advice, with the benefit of lived experience. Representatives of these national networks are police officers and staff. In our view, it is legitimate for them to offer advice to Government and policy-makers on policing. But they shouldn't publicly criticise government policy.

It is important for networks to communicate with forces about plans to recognise individuals. We heard examples of national networks presenting awards and recognising the achievements of individuals in some forces. While we applaud recognition and reward, if it is done without communicating with the force, it could create embarrassment for all parties concerned, particularly if the individual is under investigation, or facing an internal discipline or even criminal sanction. This is information that may only be known by the officer's or staff member's home force. The NPCC told us that it had recognised and was responding to these concerns.

One NPCC lead told us that staff networks needed clearer guidance to mitigate the risk of them appearing to be political. We agree. At the time of our inspection, the NPCC was reviewing the structure and governance arrangements for national police networks, with the aim of publishing new national guidance.

The role and terms of reference for national networks need to be clear and consistent

National police networks have an important role in policing. Some networks operate more independently from NPCC governance and oversight than others. The governance arrangements for national networks must reflect that networks are both of policing and for policing. The terms of reference for all networks receiving and benefiting from public funding, police resources and support need to be broadly consistent with the aim of the NPCC to "set direction in policing and drive progress for the public".

We also heard from representatives of the Police Federation of England and Wales. They told us they were concerned that some officers inappropriately go to national networks for advice and representation. They told us that this was a risk because network representatives aren't necessarily qualified to advise and support people through formal employment processes. Representatives of statutory staff associations and unions reinforced this point during focus groups in some forces we inspected.

The NPCC's review of networks should create clarity about the purpose, administration and governance of networks. This will support networks in continuing to help officers, staff and police forces make much-needed improvements. The NPCC's resulting guidance needs to clarify issues that are political, and prevent networks making mistakes that can have a negative effect on the public perception of policing generally. Police officers and staff involved in networks at both a local and national level must be accountable to the same standards of impartiality as every other officer or staff member. It is the responsibility of the officer's or staff member's home force to maintain oversight of their conduct and behaviour.

This should include the use of social media communication by network representatives and the oversight arrangements for monitoring social media. Such communication must be subject to the same level of transparency and accountability as other forms of police activity. Therefore, all network communication

should be conducted using police force accounts and should be monitored by the relevant home force.

Most importantly, the NPCC guidance should strengthen the role of networks in improving policing services for the public. We welcome this review.

Recommendation 21

By 31 March 2025, the [National Police Chiefs' Council](#) should publish a national terms of reference and governance structure for staff networks. The National Police Chiefs' Council and forces should withdraw funding and resources from any staff network that doesn't comply with these governance arrangements.

The National Police Chiefs' Council should also publish guidance to forces to make sure local and national networks operate in a consistent and coherent manner.

Funding and support for networks

Not all networks receive the same level of support

Local networks mirror the valuable work of the national networks. Groups and associations at force level cover even more interest areas than the networks at national level. We found that local networks have a different naming convention to national networks. This isn't helpful as it sometimes leads to networks being confused with formal staff associations.

The national networks are all linked to protected characteristics under the Equality Act 2010. These networks have a direct relevance and relationship with historical challenges around recruitment and retention. Many of the local networks don't. In addition to branches of the national networks, we saw groups including:

- Men's Group;
- Neurodiversity Group;
- Gender Critical Network;
- Vegan Police Network;
- Chinese and South East Asian Staff Association;
- Humanist Society;
- Police Greek and Cypriot Association;
- Menopause Group;
- Sustainability/Green Police Network;
- Ex-Military Personnel Network; and
- Carers Network.

Every chief officer we spoke to recognised the importance of these local groups. They have different titles, but we heard them routinely described by the term networks. Forces vary widely in the networks they have, and this reflects differences in force size, diversity of workforce and resident population. Some of the forces we inspected were in the process of reviewing and updating their guidance on staff networks.

Some of the chief constables we interviewed told us they believed their support for certain networks went beyond or contravened the Equality Act 2010. They said that this is because these networks weren't supporting people with protected characteristics. Examples they gave us included carers', vegan, men's, sustainability/green and ex-military networks. Contrary to the views of those chief constables, we believe most of these groups, either explicitly or because of subsequent case law, are likely to be protected under the Equality Act 2010. This is further evidence that policing is confused by this complex legislation. But regardless of their Equality Act 2010 status, we heard a coherent and sensible rationale for all of these respective networks.

Forces' rationales and processes for allocating funding to networks are inconsistent

Most of the inspected forces provide a small budget for their networks. The figures vary depending on the size of the force. Some provide a budget for all networks to bid for; others allocate money direct to each network. But we found the investment in all forces to be consistently low as a proportion of the force operating budget. We saw a variance in the annual funding forces allocated to networks. This ranged from £1,500 to £31,000. In one of the largest forces we inspected, the allocation equated to only 0.006 percent of its annual budget.

Many of the chief constables accepted that they didn't directly link their support for some of these groups to under-representation. Other forces told us that they provided equal opportunity to all their various groups, but that some groups were larger and more effective than others at accessing support. In most forces a senior officer, often a chief officer, has responsibility for networks and staff associations.

In a small number of forces, the chief constable told us that they do prioritise support, time and funding for networks in relation to certain protected characteristics. One network lead told us:

“Not every group is considered to require the same level of support and protections, particularly when considering the impact and how wide an audience is affected. This inevitably influences the level of resource and time given to each area.”

These forces place more emphasis on funding and resources for those from under-represented protected characteristic groups. We agree with this approach.

The activities of some networks can have a negative effect on trust and confidence

Most forces we inspected had governance arrangements to support their networks, and make sure that their networks operated in line with the force's strategic direction. However, in one force, we weren't confident that senior leaders were effectively managing their networks. We found evidence of network leads attending public force performance meetings and attempting to hold senior officers to account. A senior officer said:

"It was like taking on a beast. They present like they are independent of [the] police, and they are paid officers. They tread the line very closely."

We heard about one example of an event organised by a force network that attracted negative publicity. This staff awareness development event appeared to have a legitimate purpose. But there were no rules or guidance to follow when arranging for outside speakers to attend. Event organisers need to assure themselves and the force that external speakers, the organisation they represent, and their views are appropriate. But in this instance, we couldn't find any evidence of that. The senior officer responsible for networks for the force told us that they had started a systematic review of their governance arrangements for all networks.

Networks can help forces navigate challenging incidents

All the senior officers we spoke to mentioned the benefits they get from their networks. They welcome their advice on operational and organisational matters. Many cited the fact that it brings insight and lived experience to decision-making and policy reviews. In many forces, their networks have developed strong community relationships. We saw good examples of these relationships helping forces deal with complex situations.

Case study 6

One force told us about an investigation of a high-profile serious crime. Initial media coverage focused on the [protected characteristics](#) of the [victim](#). This resulted in a perception of increased risk within sections of the community. To investigate effectively, the force had to communicate with people who shared the same protected characteristic as the victim. The network lead for this protected characteristic group worked alongside the force leadership and investigation teams. The network lead provided the force with a way of communicating with the local community and helped design and share appropriate messages and reduce tension. The force told us it received significant positive recognition from the local community as a result of this approach.

Case study 7

In another force, we heard how some of the networks had come together to support local neighbourhood teams responding to events relating to the conflict between Israel and Palestine. Members of the force's Jewish Police Association and Association of Muslim Police had carried out patrols with local teams and advised the force communications teams and public order commanders. A senior officer told us that this had helped the force respond in a culturally appropriate and balanced manner.

Forces need to make sure they prioritise their support for networks in line with their recruitment and retention requirements

Most of the inspected forces have effective control and governance arrangements where local networks are concerned. But too many forces adopt a blanket approach when they allocate what little resources they can provide. All the local networks we identified in this inspection have a valuable and legitimate place in their respective police force. They provide important advice and guidance to colleagues, and they work hard to improve the working environment for those they represent.

Forces need to work creatively to make sure they continue to support all networks, but they need to prioritise their limited resources better. This will help them maximise the benefits of improved recruitment, retention and progression for those groups where progress has been too slow. The forces that have adopted this approach, specifically in relation to their increased support for the [Police Race Action Plan](#), are leading the way.

Recommendation 22

By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

Officers and staff don't always understand how and why force leaders prioritise networks

We spoke to many of the officers and staff involved in different networks. Many of them work in local force networks or a local branch of one of the national networks. We were consistently impressed by the dedication, passion and commitment we saw.

We found that the amount of time forces provided for those involved in network activities varied. In most cases, this was dependent on the size of the force, or the size of the particular network. We found that generally forces allowed those involved in networks between 8 and 12 hours of duty time each month. Officers and staff told us that they often prioritise their police role over their network responsibilities. This results

in many of them working in their own time on their particular network activities. A force network lead told us:

“If networks enable the police to be more representative and empathetic, then they are supporting a more effective service for the public, given the importance of those Peelian principles.”

In all the inspected forces, we found those representing networks were trying to improve the working environment for those they represent. Some of them recognised that some of their force networks were more prominent than others. They explained that the reason for this was often due to the number of network members and the effective performance of the network generally. Many accepted that the work of LGBTQ+ networks was sometimes more visible than other networks. Network representatives explained that this was because there was a need to display support for colleagues who might not openly share or acknowledge some of their protected characteristics.

Most of the networks we encountered have satisfactory arrangements for meeting with senior leaders. But not all of them were happy with the level of support their network received. Disability and faith networks often told us they were treated less favourably and received less support or funding. In one focus group, officers and staff told us that the lack of equity in the support provided to some networks was due to their force prioritising some of them. In another force a chief officer told us:

“Some characteristics are more protected and more embedded, and we skew the focus we give and apply as a result.”

Impartiality doesn't necessarily mean the police treat every protected characteristic or network in the same way. However, we saw a number of forces where personnel perceived the visible support and encouragement for some networks as disproportionate, so this appears to them to be biased. With a robust rationale and clear communication, the force may appropriately justify this position. Without justification, the force risks discriminating against other groups. Most forces weren't able to reassure us that they had the required rationale for the position they take.

Local networks need clear guidance on their role, particularly in relation to politicised or contested issues

Much like the national networks, we found local networks to be involved in many different roles. These included designing and reviewing policies, advising on community policing, and the development and provision of training. In all forces, we saw networks, formal staff associations and union representatives contributing in more strategic meetings. Some of those involved in networks openly describe this internal influence as “lobbying” for positive change within their police force. But most clearly recognised that this wouldn't be appropriate on matters outside policing, particularly those that are political or contested.

Many of those we spoke to recognised that any overt involvement in conventional party politics was unacceptable. It wasn't clear to us that all personnel were alert to, or felt the same responsibility towards, involvement in social politics or causes. In their work within local communities, those involved in networks often work alongside other groups or organisations with a vested interest. We have heard on numerous occasions throughout this inspection about the importance of the police engaging with those who may hold challenging or uncomfortable views. But we saw very little evidence that there were appropriate governance arrangements to make sure each force was fully aware of the risks such relationships pose. Officers, staff and networks need clear guidance to help them navigate these complicated topics.

Some networks have opposing views to other networks, but this can support police impartiality

During our inspection, we became aware of a new national network emerging within policing supporting those with gender critical views. A senior NPCC lead told us that it was important for all networks to be working professionally and respectfully for the benefit of policing:

“It is okay to have networks that hold contentious views. If the Home Secretary can engage with organisations that are contentious, such as Fair Cop [a free speech organisation], then policing should be able to manage different views internally. You do not need to agree with people to engage with them.”

The NPCC has developed a definition for what constitutes a national network. The definition describes the criteria that the NPCC applies to any proposed national network, which must:

- link to a protected characteristic defined by the Equality Act 2010;
- have an elected chair;
- have membership open to all police officers and staff;
- raise awareness of issues that affect people who share the protected characteristic;
- support the police service to provide a fair and equitable service to all communities;
- support the professional development of personnel who share the protected characteristic;
- recognise intersectionality, and engage across networks to create a co-ordinated, effective approach and reduce duplication;
- act as a stakeholder at a national level, and provide a link to local stakeholder engagement through a local footprint;
- not be a statutory association; and
- not duplicate existing national networks.

The NPCC is developing a new process along with supportive guiding principles for any emerging network which wishes to be recognised formally as a national staff network.

Not all officers and staff value the work of networks

In the forces we inspected, we spoke to many police officers and staff working in a variety of roles. Many of them told us how important networks were in their force. In most forces interviewees told us about the useful advice networks give to colleagues to help them navigate difficult incidents. In one force a group of public order commanders told us how helpful their network representatives were in supporting the response to spontaneous incidents. In another force we found that it had brought together network representatives into a group of tactical advisors for [critical incidents](#).

In interviews with managers within professional standards teams, we heard how they also benefit from networks' advice. One senior officer told us that networks were a "critical friend" when dealing with some complicated issues. In another force, personnel told us how grateful they were for the advice and support provided to them by a faith-based network in relation to a developing situation.

Not all of those we spoke to were as positive about the role of networks in their force. In one force, some officers and staff told us that they felt networks spent too much time on non-policing issues. In another force, officers and staff in a focus group told us they felt that some networks were more supported and had more power and influence than others. As a consequence, some members of the focus group feared questioning or challenging network representatives. They said that there might be sanctions if they spoke out because "networks have a direct line to the chief officer team".

In our call for views, we asked respondents whether they had access to networks to support them at work. Of the respondents, 87 percent stated that they did. We also asked whether they participated in network activities, and 62 percent of respondents confirmed that they did. But we were unable to explore this in any detail.

When asked if they felt participating in networks helped them in their work, 86 percent of respondents indicated networks were helpful, compared to 14 percent who didn't find them helpful.

We also asked respondents whether participating in networks helped them serve the public better. In total, 51 percent of respondents stated that it was helpful, compared to 15 percent who disagreed, and 34 percent were unsure either way.

In our call for views, we also asked whether respondents felt participating in networks helped them to maintain impartiality. In total, 54 percent stated that it was helpful, compared to 13 percent who didn't think it was helpful, while 33 percent believed it was neither helpful nor unhelpful.

When asked in an open text question to explain the effect that participating in staff networks has on their job, respondents commented on how these networks help them to feel supported. They provide a space for them to discuss potential issues or to get feedback on how to approach certain situations at work related to their impartiality. Some felt that the staff networks advocated for their welfare and that they were a vital communicative link between the workforce and senior leaders. For those who had a more negative opinion, some commented that staff networks didn't provide enough practical support for personnel, or that these networks were too political.

Public views on the benefits provided by networks are mixed

In our public survey, we asked respondents whether they thought police officers and staff participating in networks was effective in helping them to serve their community. We recognise that not all respondents will have a detailed understanding of the role of police networks. In total, 35 percent of respondents felt it was effective, compared to 21 percent who didn't, and 44 percent who didn't know either way.

In our public survey, we also asked respondents whether they thought the police participating in networks helped them to be impartial. In total, 25 percent of respondents believed it did help the police, compared to 11 percent who didn't, while 30 percent thought it had no impact, and 34 percent didn't know either way.

Annex: Data and research

Call for views from police officers and staff

We carried out a call for views from police officers, staff and volunteers across forces in England and Wales. We sent the link to the call for views through our monthly stakeholder newsletter in December 2023, and asked for it to be publicised in all forces. It remained open until 8 January 2024. The call for views was voluntary and anonymous, and covered a range of areas relating to impartiality and equality, including:

- understanding of impartiality;
- force communications with the public;
- staff networks; and
- diversity, equality and inclusion.

In total, we received 1,766 responses to the survey. Of these, 1,413 were fully completed, while 353 were partially completed. We analysed both full and partial responses.

Public opinion poll

We commissioned Ipsos to carry out a public opinion poll. The poll was available to adults aged 16–75 throughout England and Wales between 15 and 18 December 2023. In total, Ipsos received 2,253 responses to the survey. The areas included in the opinion poll were similar to those included in the call for views.

Social media research

Police forces in England and Wales provided the details of all X (formerly known as Twitter) accounts that are officially associated with their force. These included corporate accounts such as @ForceNamePolice, individual accounts such as @ForceNamePoliceChief, and associated accounts such as @ForceNamePoliceDogs or @ForceNameLGBTQNetwork.

We assessed these for validity through [Tweet Flash – Twitter Scraper](#). Of the more than 1,000 accounts, 597 were unique, had posted at least one tweet within the time frame, and had publicly accessible content. We scraped posts from these accounts between 1 January 2017 and 28 November 2023 and gathered information such as the number of likes and followers.

Table 1: Information gathered from X data

Post	Account
Number of likes	Number of followers
Number of reposts	Total number of posts
Number of quotes	Account created date
Number of replies	Full name
Date and time of post	Description
	URL
	Location
	Verified user

Post segmentation

We used keywords to segment post content considered operational vs an indication of the involvement in politicised matters.

Operational posts included appeals such as a call for witnesses to an incident, promotion of recruitment initiatives or training programmes, and public safety alerts such as road closures for events.

We used a series of keywords relating to three areas of interest – climate activism, gender and racial politics – to identify posts that might indicate an involvement in politicised matters. Examples of keywords are gender, LGBTQ, racism and climate.

An initial review of the segmentation with a [dip sample](#) of 200 posts per keyword found that only a handful of posts (less than 5) were non-operational.

We used a statistical method called cosine similarity to assess post content more robustly against the subject areas. Cosine similarity is a softer form of semantic search than hard keyword searching. It first takes an embedding of the tweet and then finds the similarity score of the keyword associated with it. Each word is given a vector, and then a cosine similarity score is generated. A 0.4 threshold score was used for the cosine similarity, the level of similarity the content had to reach to be considered non-operational.

To be considered effective, a social media post needs engagement by users of the social media platform. A post that gets a lot of engagement is considered to have gone viral. There is no standard definition of what it means for a social media post to go viral. And there is no easy way to measure it. A post may only get a small amount of engagement (a like, comment, reply or quote), but it may be considered viral if the content has been shared multiple times off-platform. This might happen if a snapshot of the content is posted on an alternative platform or featured in a news article. Secondary uses of the post might also allude to the post having gone viral to drive engagement with that secondary post or article. So our analysis has focused only on the amount of engagement with posts overall in comparison to each other.

The engagement per follower is an important metric as the posts that cover specific subjects are more likely to come from smaller accounts. Therefore, we would expect them to receive less engagement than those from larger accounts. By dividing the number of engagements by the number of followers the account has, we found a normalised measure.

We used a Poisson distribution, which is a test used to understand the probability of events occurring so they can be compared, to test if the engagement of operational vs non-operational posts was different. We found that it wasn't.

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