

The Rt Hon Yvette Cooper MP  
Home Secretary  
Home Office  
2 Marsham Street  
London

Our ref:TP/AH02

29 October 2024

Dear Home Secretary

**RE: An inspection into activism and impartiality in policing.**

Thank you for the opportunity to comment on this national thematic inspection.

There were nine recommendations which impacted on police forces and chief constables. Suffolk Constabulary have provided an update on their progress regarding these recommendations which I attach and will publish on my website.

I am confident that Suffolk Constabulary has the appropriate policies and processes in place with regard to the recommendations made and that they will continue to review and update them in line with subsequent changes to the College of Policing guidance.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk



## **Response to HMICFRS' report: [An inspection into activism and impartiality in policing](#), September 2024**

In September 2024, HMICFRS released this national thematic report which detailed the findings of its inspection into activism and impartiality in policing. This inspection was conducted as a result of a section 54 commission by the then Home Secretary to investigate 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.

In total, the report makes 22 recommendations, of which nine are for police forces. Suffolk Constabulary accepts these recommendations and the below sets out the constabulary's response to these.

### **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.

*Suffolk Constabulary's Corporate Communications Team has a strong and productive relationship with the Office of the Police and Crime Commissioner (OPCC) and so if media queries are received on politicised and/or contentious issues, the manager or deputy would discuss with the PCC Head of Communications and Engagement who is best placed to respond to them. To ensure operational impartiality, it is often most appropriate for the OPCC to manage this process.*

*An incident of interest log is circulated on a weekly basis to the Chief Officer Team. This contains any contentious issues to be discussed at the Chief Officer Meeting in anticipation of media enquiries. Suffolk and Norfolk's Joint Communications and Engagement Policy contains a list of questions that should be taken into consideration as to whether media engagement should take place on a particular issue. The policy also includes reference to the importance of relationships with communities, our partners and the media and that they "should live up to the highest standards of impartiality and integrity", to avoid operational compromise.*

*In terms of social media access, officers and staff receive an online training input if they would like access to one of the force's accounts to post content. This needs to be completed before they get access to ensure they post appropriate and non-contentious content. Additionally, there is a Social Media Guide that users can refer to in order to avoid posting contentious content. The force's Digital Engagement and Social Media Strategy outlines what the process is for monitoring for inappropriate or contentious content.*

*Once the new College of Policing Authorised Professional Practice (APP) is published, the Corporate Communications Team will reflect and assess if the local policy will need updating and amended as appropriate.*

### **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.

*This recommendation is covered by the Uniform Standards Policy, which references the wearing of a single tie pin, badge or patch as long as these “do not affect the individual’s professional image.” The policy is currently owned by the Professional Standards Department (PSD) but is under review with a proposed transfer of ownership to the People Directorate. The policy will be reviewed in light of current guidance and will be updated as required. The revised policy will be submitted to the Joint Chief Officer Team for review.*

*In the interim, PSD are undertaking some research into complaints and conduct data in relation to impartiality with visual representations and the team will also seek the views of others, for example, Staff Associations, Networks and Federation and Community Safety Teams. Any changes will also be aligned to cultural objectives and the Equality, Diversity and Inclusivity (ED&I) Strategy.*

### **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.

*Suffolk Constabulary has recently updated its Equality Impact Assessments (EIA) Policy (September 2024) and has trained project managers and HR teams on how to complete EIAs. However, the responsibility for the EIA quality and content is held by the Senior Responsible Officer (SRO) of a project and as part of the force’s ED&I action plan, the team will be contacting all SROs to outline their responsibilities and ask them whether they feel they need any additional training or information to support them in fulfilling their responsibilities. Further training and inputs will be scheduled depending on responses.*

### **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.

*Suffolk and Norfolk’s Central Policy Unit (CPU) maintain a well-established review process which is determined by the policy’s risk score. The risk score is determined through the application of a risk matrix, which is consistently applied by the CPU with the policy owner. As a result, policies are required to be reviewed on a two-, three- or four-yearly basis, depending on the score.*

*All policies are maintained in a central library maintained by the CPU and reviews are initiated six months before the review deadline to allow for appropriate review, consultation, ratification and publication.*

*All policies must be accompanied by an Equality Impact Assessment (EIA), which the consultation process helps to inform.*

*Consultation on a new/reviewed policy includes department leads from specialist areas such as: People Directorate and Legal Services, and an Independent Advisory Group (IAG) are also included within the consultation. Thereafter, the policy is ratified at a Joint Negotiating Consultative Committee (JNCC) meeting. The JNCC also includes representation from Staff Associations and is chaired by the Deputy Chief Constable on behalf of the Chief Constable.*

*An accessible policy template is used for all policies and includes links to the Equality Act 2010 via the Government website. Where Government marking allows, a policy will be published on the outward facing constabulary website. Internally, all policies are published utilising the constabulary intranet site and these remain a ‘front page’ feature of the site to enable easy access for users.*

### **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 Suffolk Constabulary Hate Crime policy was updated in October 2023 to reflect changes to non-crime hate incidents (NCHI) and to ensure the requirements of officers complied with College of Policing guidelines. An online learning and development package was developed and mandated for completion by all front-line officers and Contact and Control Room (CCR) processes have been amended to follow new*

*NCHI guidance at the point of reporting. Briefings to the CCR teams were provided in June 2023, with updates in October 2024 being provided as additional inputs to each CCR team during training days.*

### **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.

*CCR recording allows for tags to be recorded against hate crime and non-crime hate incidents in order to undertake effective analysis, research and reporting. Hate tags are also a requirement of investigations recorded on the constabulary's Records Management System. A Crime Data Integrity (CDI) group regularly reviews compliance with force recording standards to ensure this is being done consistently.*

*Quarterly data packs are produced for hate crime and NCHI; one for the police and a sanitised version for partners. This pack is used to inform gaps in CDI and recording processes, and to monitor compliance.*

### **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.

*In October 2024, a Standard Operating Procedure (SOP) was published, which includes the dissemination of an information flowchart to all front-line officers and CCR staff. This flowchart supports CCR staff in correctly recording non-crime hate incidents. This was delivered alongside bespoke training for CCR teams, covering the changes and new processes.*

*Audits have been completed by the CDI team to monitor compliance levels, failures and areas for improvements on an ongoing basis. Where policy is not complied with, further activity takes place to address either individuals or the processes. The role of Suffolk Constabulary's Diverse Community Coordinator role has been expanded to include reviews of all Hate Crime and NCHI to provide advice and guidance to front-line officers aimed at ensuring CDI compliance and to drive improvements.*

### **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.

*Suffolk Constabulary's refreshed Hate Crime policy is now wholly reflective of NCHI guidelines as provided by the College of Policing (CoP). The Force Action Plan has also been refreshed to reflect the CoP's APP regarding hate crime.*

### **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.

*The Suffolk Police Executive team have regular contact with representatives of their staff networks to discuss concerns, share ideas for support and identify opportunities for community engagement. This includes discussion of ethical concerns relating to impartiality, with a route to ethics boards for further consideration. The team also uses it for setting priorities (such as commitments in the Race Action Plan) and budgets for key events like conferences, promotion material and resources.*

*This recommendation will be considered by the Joint Equalities Board when it next meets, and if it is decided that any changes need to be made to our current process, these changes will be implemented, and the Staff Support Network Groups Force Policy Document will be updated in line with this.*