



# Equality, diversity and inclusion strategy 2022-25

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# 1. Introduction

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The Independent Office for Police Conduct (IOPC) is responsible for overseeing the police complaints systems in England and Wales. Our mission is to improve public confidence in policing by ensuring the police are accountable for their actions and that when things go wrong, lessons are learnt.

We live in multi-cultural communities, filled with diverse people, varied viewpoints, and wide-ranging skillsets. To provide the inclusive, quality service that our users expect, the IOPC workforce needs to reflect and mirror the communities we live and work within, across England and Wales. We must develop our understanding that equality, diversity and inclusion (EDI) is not a “bolt on” topic area, but that it underpins the work we produce. This strategy seeks to aid us in achieving that objective. More than that, the IOPC needs to become a culturally competent organisation

## **What do we mean when we say cultural competence?**

We use the term “cultural competence” to describe the knowledge, attitudes and skills required to demonstrate sensitivity and empathy when working with others from different backgrounds, which feeds directly into our work. By this we mean “the ability of individuals and systems to work or respond effectively across cultures, in a way that acknowledges and respects the culture of the person being served” (Williams 2001).

Focusing on our cultural competence will support our organisational capabilities to continually produce excellence in our outcomes, therefore providing a gold standard public service. If we are not culturally competent ourselves, we cannot play our part in helping the police to build an institution that serves every member of the public and has the confidence of people, regardless of their background.

Our valued national model of policing with the consent of the people is undermined if, as now, particular communities and groups have low confidence in the police.

We have taken great steps to improve ourselves:

- introducing a new, more inclusive method of recruiting,
- increasing our support for groups under-represented at management level to access development programmes,
- increasing our stakeholder engagement
- launching operational-wide training for staff on recognising discrimination within our investigations.

However, we recognise we have more to do to create a diverse and culturally competent organisation.

## **What do we mean when we say diverse?**

When we talk about diversity, we mean understanding and incorporating the views and realities of everyone and how we identify ourselves. This can be under banners such as age, disability, class, gender (including people who are trans or non-binary), marital, civil partnership status, or being single, being pregnant or being a carer,

racial or ethnic background (including nationality and colour), sex, sexual orientation, religion, beliefs and other ways of being, and how these “intersect” with each other.

### **What do we mean when we talk about intersectionality?**

Intersectionality is a framework for understanding how aspects of a person's social and political identities combine to create different types of discrimination and privilege. It is the acknowledgement that everyone is an individual, has unique experiences of discrimination and oppression, and that we must consider everything that can marginalise people. Intersectionality provides the space for us to consider broader concepts than protected characteristics. For example, how neurodiversity and mental well-being are viewed in society and how they connect with a person's background, as well as the other characteristics that person identifies with.

This strategy sets out our bold plans to develop our inclusivity and capabilities by:

- achieving a diverse workforce
- systematically developing cultural competence across our workforce
- placing equality, diversity, and inclusion at the forefront of everything we say and do as an organisation

It sets a roadmap, some milestones and measurements of progress. It attempts to map the stages of our journey from 2022 to 2025, recognising that as we reach evaluation milestones, we will make changes as needed. This strategy does not stand in isolation from our business plans, rather it gathers objectives within existing plans to help us to focus on whether we are doing enough to achieve our ambitions. In devising this strategy, we have brought together the work from our People directorate, Strategy and Impact teams, such as policy, communications and stakeholder engagement, and our Operations work, including our Discrimination Subject Matter Network which is represented by all areas of the organisation.

We acknowledge that this phase of our strategy places some emphasis on race. The police response to the racist murder of Stephen Lawrence was the catalyst that established an independent police complaints body and therefore we are an organisation born out of a response to hate crime. There remains powerful evidence that Black communities, along with other ethnic minority communities have low confidence in the police and race is therefore a focus for our work. That being said, with race as the overarching focus, we must be aware of intersectionality within ethnic backgrounds, and the issues and needs raised by those groups.

## **2. Guiding principles**

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To improve our workplace and services for all, our work will be underpinned by five key principles which will support us to meet our objectives:

### **Developing our workforce**

We want to be an organisation where we attract a diverse talent pool, and where our colleagues feel supported, and invested in. We want the value of diversity to be

recognised by all colleagues and to support all colleagues to understand the benefits of an inclusive workforce.

### **Providing an effective, inclusive service to our communities**

We want all communities to easily access our services and for their needs to be met throughout our engagement with them. We also want our work to respond to community concerns raised in the engagement activities we conduct with them and for all communities to have confidence in our outcomes.

### **Inclusive leadership**

We need strong, visible leadership to demonstrate and advocate our commitment to a culture that removes barriers and values diversity. Our leaders will recognise the power of diversity to holistically enhance us and the advantages of diverse decision making.

### **Having a strong and independent voice**

We want to have an active, prominent, and respected voice on equality, diversity, and inclusion that our statutory stakeholders, such as the police, can point to in addressing issues affecting their services and workforces.

### **Ambitious aspirations**

We want to be an industry leader in inclusive practices, in promoting positive action interventions. We also want to significantly improve confidence in the police complaints system in groups who historically have lacked it, particularly those from Black, Asian, and minority ethnic communities and young people. This means we must be actively anti-racist, and have zero tolerance for homophobic, misogynistic, ableist or otherwise discriminatory behaviours. It also means having a greater understanding of the intersectionalities that exist, the issues faced and how they differ.

Part of this work will be about ‘turning the ship around’ on thought processes about equality, diversity, and inclusion from being something that we consider to be part of our work, to being something that **is** our work. Our organisation’s mission is to improve public confidence in policing by ensuring the police are accountable. Therefore, ensuring equality and equity in policing, which demonstrates our need to lead the way, by being aware of social developments, and listening to internal and external stakeholders. We have platforms to support us in this such as our Staff Networks, the Equality, Diversity and Inclusion Advisory Group, and our Stakeholder Engagement team. By using these, we will have the capabilities to act quickly with a critical perspective, producing novel and innovative thought and working processes where necessary, supporting us to achieve our strategic priorities.

## 3. Our objectives

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Guided by these principles, we set ourselves the following three objectives, which we aim to achieve by 2025.

### Objective one – our organisation

To create an inclusive, respectful environment where diversity is understood and valued, with a culturally competent workforce that has the skills and knowledge to recognise and challenge discrimination.

### Objective two – our service users

To deliver a culturally competent, equitable service to all of those we come into contact with through our work.

### Objective three – our communities

To actively work to improve the confidence of those communities and groups who have least confidence in the police complaints system.

## 4. Our strategy

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### Objective one - our organisation

To create an inclusive respectful environment where diversity is understood and valued, with a culturally competent workforce that has the skills and knowledge to recognise and challenge discrimination.

### Creating an inclusive organisation

#### Leadership

The strong, visible leadership of our Director General and senior management team is key in demonstrating our commitment to a culture which removes barriers and values diversity. All our leaders will recognise the power of diverse, decision making and share this commitment. We recognise we have insufficient diversity at senior levels (which we define as Grade 15+ including our non-executive Directors) and that this impacts public confidence in us. So we established an EDI advisory group chaired by the Director General, with membership that represents our diverse workforce and who offer advice, direction, and challenge on our work.

Moreover, a lack of diversity of thought, understanding and experience will hamper us. It is important that our senior leaders focus on cultural competence ensuring that those they oversee do the same, allowing this mindset to filter through the

organisation. This helps us to bridge the current gap, while we simultaneously focus on creating more diverse senior teams.

We recognise that senior staff communicating about diversity issues inside and outside the organisation is a powerful way of reinforcing the culture we wish to create and speaks to our values.

### **Staff insights**

We want to be an organisation that listens and empowers a diverse range of staff. Our staff networks already have a direct way to influence delivery objectives.

We recognise that our staff networks should help to inform our communications and ensure that we speak up when it is appropriate to do so. Incorporating ways to develop our understanding of colleagues' concerns is essential to this. We want to be proactive in our work and engage with our colleagues so we are knowledgeable about the things they are concerned about.

### **Understanding and changing the profile of our workforce**

We seek to be a leading organisation in inclusive practices and in promoting positive action interventions. This means retaining our existing diverse colleagues and attracting diverse new applicants. To do this, we need to develop the sense of belonging our colleagues have with the organisation and build our diversity data so that we can use it as evidence to further our inclusion work. We already introduced a new recruitment policy which has inclusion at its heart and launched Success Profiles for a fairer, more inclusive method of assessment.

### **How will we know we have been successful?**

We will provide our colleagues with the tools to be more appreciative of cultural difference and the intersectionality that exists. In addition, our workforce composition will be more representative of the communities we serve at every level, evidenced through:

- 20-30% of all job applications will be from people with a protected characteristic.
- a pipeline of diverse talent from protected groups as a result of our positive action initiatives
- lower than average turnover for colleagues from Black, Asian and minority ethnic backgrounds
- increased numbers of women, LGBTQ+, disabled, and Black, Asian and minority ethnic colleagues in senior roles (grade 15+) by 2025, compared to 2022.
- A five-percentage point increase in the proportion of colleagues from Black, Asian and minority ethnic backgrounds by the end of the period

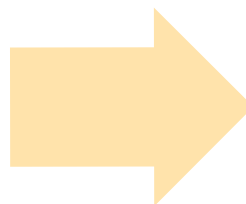
- We will understand the intersectional barriers faced by colleagues from under-represented protected characteristic groups and will continue to develop action plans to break these down.
- We will have a full suite of policies addressing potential discrimination.
- We will have less than three cases per year about breach of our respect policy by the end of the period.
- Our gender pay gap will be significantly reduced from the baseline of 8.4% in 2021 and our ethnicity pay gap will be significantly reduced from 5.1% in 2021.
- We will demonstrate that colleagues with protected characteristics feel better supported and are confident about voicing their views:
- Our survey of staff with protected characteristics will show continued improvement in satisfaction each year.
- Staff network membership will grow.
- Our leaders will visibly sponsor and support the development of colleagues from under-represented groups
- 50% of senior leaders will be engaged in coaching a colleague from an under-represented group outside their own management line.



## What will we do, and when?

### 2022

- Launch further 'know the line' training and embed the campaign throughout the IOPC.
- Train colleagues in the use of restorative practice techniques.
- Build on our diversity data, using it to inform and guide decision making.
- Use our annual gender and ethnicity pay gap reports to develop action plans which improve gender and race pay equality.
- Continue 'Inclusion Ambassador' secondments to help to deliver Staff Network priorities.
- Develop the EDI Learning and Development programme, assisting our colleagues to grow their cultural intelligence and recognise intersectional issues.
- Survey colleagues and staff networks to understand their concerns and align our EDI delivery plans in response
- Create a permanent Equality, Diversity and Inclusion team who will push our organisation to achieve true inclusivity
- Deliver our second Aspiring Professionals internship programme to inject fresh diverse talent into our organisation
- Celebrate the diversity and inclusive practices across our organisation through staff engagement events and initiatives, such as Pride and Black History Month.
- Ensure leadership promotes our commitment to equality, diversity, and inclusion by leading through their own example
- Reverse mentor senior leaders to develop their understanding of the experiences of our colleagues
- Focus on attracting diverse talent and help potential applicants to understand what it is like to work at the IOPC, using positive action where suitable



### 2023 - 25

- Build on the allyship programme, developing allies' understanding of intersectionality for their colleagues.
- Build our Aspiring Professionals Programme and appoint a Programme Manager to broaden the reach.
- Develop an entry level career programme for some of our Aspiring Professionals.
- Embed 'micro' EIAs into our work so that equality considerations are always front of mind.
- Achieve the objectives set out in our Welsh Language strategy.
- Provide career development activities that enable all colleagues with protected characteristics to develop and progress.
- Continue our work to achieve and maintain our status with organisations such as Stonewall, Disability Confident and the Race at Work Charter.
- Continuously review the way we advertise our roles, the language we use and the images we choose, in line with our social media strategy.
- Roll out restorative practice as a means of ensuring all voices are heard when dealing with conflict.
- Analyse themes from exit interviews conducted with staff with protected characteristics and address emerging concerns.

## Objective two - our service users

**To deliver an equitable, culturally competent service to all of those we come into contact with throughout our work.**

### Developing cultural competence

We recognise the need to be an exemplar as we play our part in helping the police to become a service that has the trust of all communities. We are committed to becoming an anti-racist organisation, and we have zero tolerance for any discriminatory behaviours. It is imperative that our colleagues focus on constantly updating their knowledge of communities, groups and individuals that make up our society, while understanding the importance of intersectionality in working with diverse communities. This ensures we can undertake our work in a culturally competent way, identifying learning, supporting our work, and improving outcomes.

We want our service users to notice the difference as we improve our understanding of communities and groups. We will share information about our initiatives on our website and through social media. We will ask for help and continue our work engaging diverse stakeholders. When we are not the experts, we will involve the right stakeholders and groups in our initiatives. We will provide a blended learning package for our staff with varied opportunities to grow their understanding, including hearing first-hand accounts, and using our learning management system, Bridge.

### Know the Line

Know the Line is our ongoing campaign to encourage the effective challenge of inappropriate comments and behaviour wherever they happen. The campaign will focus on one community or group each year providing base level information and learning. Know the Line is backed by our Respect policy which sets out our zero-tolerance vision of disrespectful behaviour

### Allyship

Our allyship programme aims to enable colleagues to enrich their own knowledge through self-directed learning activities; from talking to a colleague, volunteering in a relevant organisation, or reading from an expanding recommended list. Our allyship programme is intended to help people to recognise the way discrimination can impact on others.

### Equality Impact Assessments

Our approach to equality impact assessments has come on in leaps and bounds through our Equality Impact Assessment mentor programme, training, and awareness. Our goal is to embed dynamic equality impact assessment in every area of our work.

## **Learning events and insights**

We will provide learning events and insight events in collaboration with our staff networks to support learning and allyship. This may include formal training, events linked to external events such as Black History Month, Pride, South Asian Heritage Month, or disability awareness weeks.

We will help all staff networks to build on the Dissolving Ignorance series, introduced by the Race, Religion and Belief network, to help increase understanding of protected groups and their experiences.

## **Youth Panel**

Our Youth Panel is engaging in a programme of reverse mentoring to ensure that senior leaders have a youth perspective. We want them to continue to influence our work injecting their experiences and ideas into our work.

## **Restorative practice**

Restorative practice is the tool we adopted to assist in the resolution of conflict and hurt. It has a role internally and externally in our primary work to examine police complaints. Restorative practice focuses on ensuring that the people involved in a complaint or dispute focus on resolution and making things better, rather than placing blame.

## **How will we know we have been successful?**

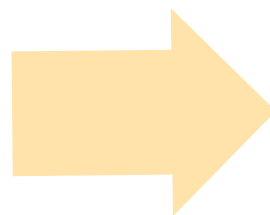
By the end of the strategy:

- 50% of our colleagues will be engaged in an allyship programme.
- Colleagues will readily consider the equality impacts of most decisions whether or not a formal process is needed.
- Service users and stakeholders who engage with us will rate us as knowledgeable, approachable, and respectful.
- Colleagues will report confidence about dealing with people from different communities and backgrounds in an appropriate and respectful way.
- Restorative practice will be embedded in our internal conflict resolution process, and we will have trialled it in our community engagement work and in complaints resolution.
- Colleagues will report fewer instances of inappropriate language and behaviours and an increased confidence in challenging them when they do occur.
- Line managers will report application of increased cultural knowledge within their team's work.

## What will we do, and when?

### 2022-24

- Explore the requirement for advocacy services
- Live by our service user standards
- Maintain our Customer Service Excellence accreditation, focusing on improvements for our service users
- Create and publish an anti-racism statement
- Complete Equality Impact Assessments to help us identify the potential impact of our work on different groups, including our service users
- Continue to deliver accessible content, that meets accessibility standards, ensuring we consider all diverse needs when creating publications.
- Empower our staff networks to raise awareness of the issues they face and share the lessons of their lived experiences and intersectionalities
- Engage with diverse communities to understand their experience of policing and complaints and share this knowledge throughout our organisation
- Encourage our staff to volunteer with charities and groups that support those under-represented in the police complaints system or have the lowest confidence in the police
- Monitor our service users' diversity to ensure we are accessible to all



### 2023-25

- Ensure inclusion and accessibility principles are embedded in all our work and make reasonable adjustments for service users where required
- Meet the Welsh Language Standards

## Objective three – our communities

To actively work to improve the confidence of those communities and groups who have least confidence in the police complaints system.

We have a shared role in the police complaints system, which enables us to address issues of discrimination actively and effectively. We can influence and affect change in policing. Doing so, helps us to achieve our mission to improve public confidence by ensuring the police are accountable for their actions and lessons are learnt. We must not allow rhetoric to be the mainstay of our interaction with communities and let our actions speak for themselves. This is particularly important for us in communities and groups where knowledge of the IOPC and confidence in our work is lower.

The areas we will focus on, including those where there is an indication that the use of certain policing powers are having a disproportionate impact on protected groups (e.g. stop and search and use of force) and those where victims from protected groups have felt unfairly treated by the police. In addition to our independent investigations, we will also draw evidence from relevant cases where we have reviewed the police forces or Police and Crime Commissioner's handling of a case.

While our operational work will make a significant difference in improving confidence, we also understand a bold and active approach is necessary in the content we develop, the campaigns we deliver and learning we identify and promote.

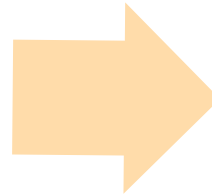
### How will we know we have been successful?

- Our communications reflect EDI principles and engage diverse audiences.
- The IOPC and our Discrimination Subject matter network is regarded as an authority on discrimination in policing.
- We will be a leading and respected voice in matters relating to equality, diversity, and inclusion in Policing.
- We will identify learning opportunities and share good practice about how policing can be improved when EDI concerns were a factor in our investigations and reviews.
- Our community and stakeholder engagement will continue to diversify its methods to engage groups and communities nationally and locally.
- There will be increased positive perception of, and engagement with the police complaints system from groups with historically low confidence evidenced through our public perception tracker.
- The impact our investigations and learning recommendations have will influence policing practice.

## What will we do, and when?

### 2022

- Continue our work on the race discrimination thematic to make a difference in policing through identifying national themes and trends of systemic issues, by making cross-cutting learning recommendations to improve police practice and involving both the community and policing voice in development of recommendations and include other organisations and academics with expertise in this area.
- Help support the organisation with the investigation and review of discrimination cases and the learning derived, through high quality advice, guidance and training
- Take on more independent investigations where race discrimination is a consideration to inform them
- Begin thematic work on violence against women and girls, developing our understanding of the trends or systemic issues.
- Have an active voice where our investigations identify issues of discrimination in our investigations, appeals and reviews and effectively addressing these, promoting learning where it is found
- Share knowledge from our Subject Matter Networks (SMN), particularly Discrimination, Mental Health and Domestic Violence SMN's to improve policing practice,
- Continue our work with the IOPC Youth Panel and learning from their contributions,



### 2023 - 25

- Continue our work on violence against women and girls thematic to make a difference in policing through identifying national themes and trends of systemic issues, by making cross-cutting learning recommendations to improve police practice and involving both the community and policing voice in development of recommendations and include other organisations and academics with expertise in this area.
- Focus on marginalised groups and their confidence in policing when developing learning and policy recommendations for the police.
- Continue to measure perceptions and shifts in confidence through our public perception tracker and stakeholder work.
- Share learning on investigating discrimination issues with police stakeholders to improve handling of discrimination issues across the wider police complaints system
- Work with our policing and non-policing stakeholders to understand EDI matters which affect them and working together to improve them.

For more information on this strategy, please contact our Equality, Diversity and Inclusion team on [equality@policeconduct.gov.uk](mailto:equality@policeconduct.gov.uk).

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