

# The Police Service in England and Wales

Full list of recommendations  
of a formal investigation  
by the Commission  
for Racial Equality

March 2005



© Commission for Racial Equality

St Dunstan's House  
201-211 Borough High Street  
London  
SE1 1GZ

First published March 2005

ISBN 1 85442 557 9 (print)

ISBN 1 85442 558 7 (pdf)

# Commission for Racial Equality

## Police Formal Investigation Full List of Recommendations

**Please note that the paragraph numbers at the end of every recommendation correspond with the paragraph number in the final report of the investigation.**

### The race equality duty

1. Chief officers should ensure that all police forces put in place their arrangements as required under the employment monitoring duty and both their arrangements and the monitoring information gathered should be readily available for regular inspection and scrutiny. This action should be carried out immediately in order to address non-compliance of the employment monitoring duty. (paragraph 2.41)
2. Chief officers should ensure that if after a monitoring exercise a force finds any disproportionality or if there are a significant number of complaints about unfair race-related practices in any area, the force should investigate to check for any discriminatory practices and take remedial action. (paragraph 2.41)
3. Police authorities and Her Majesty's Inspectorate of Constabulary should, within their scrutiny or inspection frameworks, automatically require forces to provide this monitoring information for the relevant period, including any annually published material, and to identify any steps taken or proposed to address racial disparities. (paragraph 2.41)
4. For national consistency, chief officers should ensure that all forces use the 16+1 Census categories for ethnic monitoring, referred to in the Commission for Racial Equality's *Ethnic Monitoring: a guide for employers* (which includes further optional categories). (paragraph 2.41)
5. Occasionally it may be necessary to aggregate categories for tracking and trending especially when numbers are very small. In these cases, chief officers should ensure that forces should adopt the 5+1 Census categories. (paragraph 2.41)
6. Responsibility for the delivery of the general duty to promote race equality and the implementation of its accompanying specific duties (and any action plan supporting these duties) should fall to either the chief constable or at the very least an Association of Chief Police Officers rank officer or equivalent. (paragraph 2.48)
7. Chief officers should ensure that any diversity manager has the support of a multi-ranked and cross-departmental team to assist in the implementation, management and review of the race equality scheme, including representatives from the main staff support groups and staff associations. (paragraph 2.48)

8. The Association of Chief Police Officers should develop as soon as possible a framework for race impact assessment and related consultations, using the web-based Commission for Racial Equality framework as a template for development. (paragraph 2.60)

9. Chief officers should ensure that staff involved in policy development are fully trained on the race impact assessment process, in accordance with the training component of the race equality scheme duty. (paragraph 2.60)

10. The Association of Chief Police Officers should develop as soon as possible a framework for monitoring for adverse impact, to assist forces in carrying out monitoring of their policies. (paragraph 2.65)

11. Police authorities must ensure that they, carry out race impact assessments and consult on any proposed policies that are relevant to race equality as required under their race equality scheme. They should publish their results, indicating any amendments made to the policy following such an exercise (paragraph 2.73)

12. Police authorities should in general ensure that arrangements within their schemes are implemented. This includes monitoring policies for adverse impact, publishing employment monitoring data relevant to employment of staff, where applicable, and training staff on the race equality duty. (paragraph 2.73)

13. The Association of Police Authorities should assist police authorities by developing impact assessment guidance as soon as possible. (paragraph 2.73)

14. We take the opportunity to restate a recommendation in our interim report, which was that police authorities (as well as police forces) review their schemes and publish revised versions by May 2005. We should add here that we do not expect the five authorities who were referred for enforcement action to carry out this recommendation, since they responded satisfactorily to the enforcement action by revising their schemes in a compliant manner. (paragraph 2.73)

## **The standards framework**

15. Skills for Justice should become subject to the general duty to promote race equality and the specific duty to produce a race equality scheme, as the Commission for Racial Equality has already proposed to the Home Office. (paragraph 3.17)

16. Skills for Justice should monitor for any adverse impact on race equality its priority policies and functions in accordance with the race equality duty. The priorities should be:

- a. To monitor its policy and function of consultation, to ensure that groups representing the widest possible spread of ethnic minority communities are proactively consulted, that feedback is indeed secured from them and that it is fully taken into account.

b. To review and revise all National Occupational Standards relating to race equality, to ensure that they appropriately reflect the general duty to promote race equality. Specifically, race equality should be part of all operational and employment decisions and actions, and any standards drawn from other sectors should be appropriately adapted to law enforcement work.

c. To review the revised Respect for Race and Diversity behaviour after one year of operation, to determine what improved outcomes it may have achieved and what if any further changes may be needed to move 'respect for differences' on to 'committed and positive promotion of race, sex and other equalities'. (paragraph 3.25)

17. In its ongoing reviews of all materials, Skills for Justice should seek to simplify them and make them accessible to the general reader. (paragraph 3.26)

## **Recruitment and screening**

18. Regardless of whether the Race Relations Act should be amended to allow positive discrimination, all chief officers should ensure that their forces should review their positive action steps with regard to the recruitment and retention of underrepresented racial groups, and to ensure that they reflect best practice within the police service. (paragraph 4.13)

19. The Home Secretary should add an appropriate annual intake target to the existing employment targets, as a more immediate and direct measure of performance regarding ethnic minority recruitment. (paragraph 4.13)

20. Centrex should take all possible steps to ensure that the June 2005 Technical Report identifies the reason(s) for race differences in outcomes. Specifically the Report must, as has been undertaken, fully analyse the initial sift stage, comprehensively test for all non-race factors that may have contributed to any disparity, and analyse combined figures for the current year and the previous year where this will give more reliable conclusions. Centrex should publish its findings regarding the race differences, and the Home Office should publish an action plan in response. (paragraph 4.40)

21. Centrex should proactively monitor race differences, establishing early warning triggers for possible adverse impact. To assist in this Centrex should (as it has informally agreed) collapse data from the 16+1 categories into the 5+1 groups. (paragraph 4.42)

22. Chief officers should ensure that their forces provide Centrex and/or the Home Office with all data concerning recruitment and selection accurately and without delay. (paragraph 4.47)

23. Centrex should review the scripted interview regarding:
- a. its consistency of application;
  - b. how its content may be made more race-specific in line with the revised 'Respect for Race & Diversity' behaviour; and
  - c. its suitability as a continuing part of the process. (paragraph 4.49)
24. Centrex should provide appropriate training and guidance to equip assessors effectively to demonstrate balance and sound judgement in assessing the use of language. Centrex should ensure that quality assessors are trained specifically on the 'Respect for Race and Diversity' component to enable them to ensure the consistency and reasonableness of assessor response. (paragraph 4.50)
25. Centrex should review its use of 'Respect for Race and Diversity' assessment forms to ensure no adverse impact on race equality takes place. (paragraph 4.51)
26. Centrex should review the ten forces which currently apply an additional interview to those candidates who have passed the screening programme SEARCH to determine the effect of this in terms of race equality. Other forces should await the outcome of this review before making any addition or variation to SEARCH. (paragraph 4.52)
27. Centrex and the Home Office should consider creating full-time assessor posts, to work regionally and/or nationally, to expand the pool of those available and to facilitate the development of professional expertise. (paragraph 4.53)
28. If the reason(s) for any continuing race differences are not identified in the Technical Report 2004/05, the Home Office should commission an independent review of the screening programme SEARCH and publish the findings. (paragraph 4.54)

## **Training and race equality**

29. Chief officers of police forces and police authorities which have not developed a race and diversity training strategy (either as a 'stand alone' document or part of another) should do so. (paragraph 5.6)
30. The Association of Chief Police Officers should develop and publish guidelines on a force race and diversity training strategy, identifying and drawing on existing good practice, and all chief officers should ensure that their forces review and revise their strategies accordingly. (paragraph 5.7)
31. The Association of Police Authorities should develop and publish guidelines on an authority race and diversity training strategy, identifying and drawing on existing good practice, and all police authorities should review and revise their strategies accordingly. (paragraph 5.8)

32. Chief officers should ensure that their forces use the learning and development skills framework as a basis for the selection of trainers. The Home Office should monitor the progress in meeting this recommendation through the Police Race and Diversity Learning and Development Programme Board. (paragraph 5.28)

33. Chief officers should ensure that their forces establish appropriate support mechanisms for trainers. The Home Office should monitor the progress in meeting this recommendation through the Police Race and Diversity Learning and Development Programme annual reporting process. (paragraph 5.30)

34. Centrex and chief officers should make completion of the Race and Diversity Trainers' Programme (or equivalent) a mandatory requirement for all in-force police race and diversity trainers. Those attending such training should be assessed against the relevant National Occupational Standards and only employed to provide race and diversity training if assessed as competent against these standards. Centrex and chief officers should put in effective support mechanisms to enable participants to complete the full programme. (paragraph 5.39)

35. Centrex should review both the Trainer Development Programme and the Race and Diversity Trainer Programme in light of the race equality duty. (paragraph 5.41)

36. The Home Office and the Association of Chief Police Officers should devise a national programme of positive action to prepare and encourage ethnic minority trainers to apply for trainer posts. All chief officers should ensure that their forces monitor, by ethnicity, both in-force and external trainers. (paragraph 5.44)

37. The Home Office and Centrex should review the learning and development skills framework to ensure it adequately reflects the race equality duty. All stakeholders should ensure that the learning and development skills framework for trainers is effectively implemented. (paragraph 5.46)

38. The Home Office and the Association of Chief Police Officers should produce proposals for raising the professional status of police training so that it attracts the 'brightest and best' applicants. (paragraph 5.48)

39. In their response to Her Majesty's Inspectorate of Constabulary's report 'Training of Trainers', the Home Office, Association of Chief Police Officers, Centrex and Skills for Justice should consider and make due reference to the relevant issues raised in this report. The Home Office, in liaison with the other bodies listed above, should draw up a service-wide timetable for addressing these issues by the end of May 2005, with progress reported on a regular basis. (paragraph 5.49)

40. Centrex and chief officers should ensure that all foundation trainers should complete training, to qualify them as race and diversity trainers, which is as comprehensive as the current three-week Centrex course. Those attending such training should be assessed against the National Occupational Standards for race and diversity trainers and only employed to deliver the Initial Police Learning and Development Programme (IPLDP) if they meet these standards. (paragraph 5.71)

41. Centrex and chief officers should identify where the use of external consultants and trainers will improve the effectiveness of foundation training, and engage such outside contributors where appropriate. (paragraph 5.74)

42. Chief officers of forces in areas with smaller than average ethnic minority populations should introduce training initiatives such as conducting training relating to race and diversity jointly with forces that cover a more multiracial population, and should engage speakers and co-trainers from ethnic minority communities from those areas, as well as from within their own force areas. (paragraph 5.79)

43. The Initial Police Learning and Development Programme Board should supplement the materials published in November 2004 with an addendum giving full guidance on meeting the training needs of foundation trainees with regard to the race equality duty. (paragraph 5.80)

44. Before the Initial Police Learning and Development Programme is rolled out to further forces the Home Office should finalise core training materials for the race and diversity content, including coverage of the race equality duty, drawn from materials that have been drafted by Centrex, and any effective examples developed by the pilot forces. (paragraph 5.81)

45. Work by the Central Authority, the Initial Police Learning and Development Programme Board and Centrex to maintain national minimum standards in foundation training should be reviewed by Her Majesty's Inspectorate of Constabulary not later than 2007, as a follow-up to 'Training Matters', and this should include an in-depth focus on the race and diversity element. (paragraph 5.82)

46. All stakeholders should give the highest priority to implementing their commitments and objectives in the Police and Race and Diversity Learning and Development Programme Strategy. (paragraph 5.118)

47. Centrex, and chief officers via their training managers, should work towards the integration of race and diversity into the courses designed to meet the role-defined needs of groups such as constables, newly promoted sergeants and so on. (paragraph 5.118)

48. Chief officers should ensure that their forces use Performance and Development Reviews (PDRs) to identify common and individual training needs in relation to race equality. Once identified, these training needs should be fed into the course design process and met, where appropriate, by external courses, projects or placements. (paragraph 5.118)

49. The Home Office, the Association of Chief Police Officers and the Association of Police Authorities (through the Police Race and Diversity Learning and Development Programme) should set a target for relevant groups of staff to be assessed as competent against National Occupational Standards units 4B2 & 4B3 by 2007. (paragraph 5.123)

50. Chief officers should ensure that their forces emphasise in training the core ethic of respect and consideration of the full diversity of individual needs and groups,



from which non-oppressive language will grow, rather than mechanistic lists of 'correct' and 'incorrect' terminology. (paragraph 5.124)

51. The Home Office should continue to scrutinise closely and oversee the Police Race and Diversity Learning and Development Programme (PRDLDP), ensuring the strategy is robustly quality assured. As part of its race equality duty, it should monitor the strategy for any adverse effect on the promotion of race equality. (paragraph 5.129)

52. Her Majesty's Inspectorate of Constabulary should carry out a thematic inspection in 2007 to measure the impact of change since the publication of 'Diversity Matters' in 2003. (paragraph 5.129)

53. The chief officers of all forces and police authorities that have not yet done so should ensure the identification of all or any learning requirements of those with specialist responsibilities concerning the race equality duty, such as reviewing the scheme, impact assessment or ethnic monitoring of employment patterns. They should address how to meet these needs in the forces race and diversity training strategy. (See our recommendation following paragraph 5.6 in section 1 above of this chapter.) (paragraph 5.139)

54. Chief officers should ensure that the learning requirements of staff who deliver training in both the general and specific duties are also identified and addressed in their force's race and diversity training strategy. (paragraph 5.141)

55. The Home Office (through the Police Race and Diversity Learning and Development Programme) should publish guidance to all forces giving detailed guidance on training in both the general and specific duties. (paragraph 5.144)

56. Chief officers must ensure that their forces analyse the training needs of all officers and staff with respect to both the general and specific duties, and then meet them either within race and diversity training or separately. (paragraph 5.144)

57. The Home Office should monitor the effect of the reduction in Centrex's budget on the promotion of race equality and reflect its findings in the organisation's budget for 2005/06. (paragraph 5.160)

58. The Home Office should consider whether there is evidence suggesting possible ethnic minority under-representation on the High Potential Development Scheme. If there is such evidence, it should commission research of a representative sample of forces, into selection, by race, for this programme, to identify and address any unjustifiable barriers to ethnic minority candidates. (paragraph 5.161)

59. The Home Office should ensure that the division of responsibilities at Hendon regarding course design, race and diversity 'proofing' and provision is examined, to remove any unnecessary boundaries and lack of coordination between these functions. (paragraph 5.174)

60. The Home Office should ensure that the management training programme at Hendon is reviewed in the light of the race equality duty, and that course objectives

are derived from the behaviours and standards laid out in the Integrated Competency Framework, including those relating to race equality and diversity. (paragraph 5.175)

61. Centrex should revise the guidance ‘Models for Learning and Development in the Police Service – A Reference Guide for Training Managers and Practitioners’ with immediate effect in respect of both the general and specific duties. (paragraph 5.183)

62. Centrex, and all chief officers through their training managers, should set a timetable for and complete a review of all their programmes to determine, and if appropriate revise, the race equality content. All courses should be reviewed in respect of both the general and specific duties. (paragraph 5.187)

63. The Home Office, the Association of Chief Police Officers and the Association of Police Authorities should develop guidance and a template for forces as soon as possible after the publication of this report, to support this review and ensure consistency. (paragraph 5.187)

64. The Home Office should monitor progress on improving inclusion of race and diversity in the annual ‘Police Race and Diversity Learning and Development Reports’. (paragraph 5.187)

65. Police authorities should put in place mechanisms to oversee and monitor the inclusion of race equality within training programmes. (paragraph 5.187)

66. All chief officers should ensure that their forces review their training selection policies and procedures, and that they take action to ensure they comply with the general duty to promote race equality. Police authorities should scrutinise this review of selection policies and procedures. Through the Police Race And Diversity Learning and Development Programme, the Home Office, the Association of Chief Police Officers and the Association of Police Authorities should monitor and review the progress made by forces and authorities in meeting this recommendation. (paragraph 5.199)

## **Managing behaviour: discipline and grievance procedures and employment tribunal race cases**

67. The Home Office should ensure proposed changes to police disciplinary arrangements are fully assessed for their impact on race equality. (paragraph 6.38)

68. In light of the Morris inquiry report, Taylor review and our report, the Home Office should consider giving police officers wider employment rights and making them subject to a non-statutory disciplinary procedure incorporated in their terms and conditions preserving the office of constable. (paragraph 6.47)

69. The Home Office and/or Her Majesty’s Inspectorate of Constabulary should urgently commission research across the police service on the nature and extent of any disproportionate impact on ethnic minority police officers that may exist in the operation of the police disciplinary procedure. (paragraph 6.64)

70. Chief officers should have systems to record management information about low-level and informal action taken to deal with racial misconduct and allegations of racial misconduct; such systems should be embedded within the force's race equality scheme and the data assessed for its impact on race equality. (paragraph 6.94)

71. The Home Office should amend the Code of Conduct in line with the Code of Ethics of the Northern Ireland Police Service, to create a single code containing standards of conduct and practice for police officers in relation to non-discrimination on racial grounds. (paragraph 6.109)

72. The Home Office and/or the Association of Chief Police Officers in consultation with the Independent Police Complaints Commission should draft written guidance on understanding racial discrimination which should be part of the police service discipline policy for police officers. (paragraph 6.115)

73. The Home Office (in consultation with the Independent Police Complaints Commission, the Association of Chief Police Officers, the Association of Police Authorities and staff associations) should prepare comprehensive guidelines sanctions for racial misconduct, as part of the police service disciplinary policy for police officers. (paragraph 6.125)

74. Chief officers should make training on disciplinary procedures, including required skills, compulsory for all managers and supervisors. The effectiveness of such training should be monitored and measured through the performance and development review process. (paragraph 6.141)

75. Chief officers should make training on investigating racial discrimination and on race and diversity compulsory for professional standards staff. The effectiveness of such training should be monitored and measured through the performance and development review process. (paragraph 6.141)

76. Centrex should review its Senior Investigating Officer training course to ensure that it adequately provides the recommended compulsory training. (paragraph 6.141)

77. In the light of the Morris inquiry findings in relation to the Metropolitan Police Service and the criticisms that have been made about professional standards departments, we recommend that the Independent Police Complaints Commission and Her Majesty's Inspectorate of Constabulary conduct a joint thematic review into the performance standards and practice of all professional standards departments. This should cover their handling of racial misconduct cases and the way that ethnic minority officers are treated in the investigation and disciplinary process. (6.152)

78. Chief officers should delegate responsibility to Centrex for disciplinary and grievance procedures at its training centres. (paragraph 6.157)

79. The Home Office should consider extending the guardianship role of the Independent Police Complaints Commission to cover the operation of the disciplinary procedure for police officers. (paragraph 6.179)

80. Following consideration of the Morris inquiry report and our report the Home Office should determine a nationally agreed grievance procedure for the police service which should be assessed by the Home Office for its impact on race equality and made compulsory throughout the police service (be it 'Fairness at Work' guidance or a different procedure). (paragraph 6.192)

81. Chief officers should ensure that staff associations are fully consulted on force arrangements for resolving grievances within timescales agreed by each force. (paragraph 6.193)

82. Chief officers should ensure that responsibility for operating the formal grievance procedure lies with staff independent of the aggrieved officer's line management. (paragraph 6.204)

83. Chief officers should implement safeguards to protect police officers from racial victimisation and to enable any such victimisation to be promptly and effectively dealt with either through discipline or through the grievance procedure depending on the circumstances, as set out in the 'Fairness at Work' circular. Any new systems and processes should be race impact assessed before they are introduced and they should be monitored and reported on. Her Majesty's Inspectorate of Constabulary should inspect such new processes once they are established. (paragraph 6.236)

84. Chief officers should promote use of the grievance procedure in all training related to race matters, publicise it widely and ensure that all officers understand the new processes. They should publish case outcomes anonymously to help manage expectations and ultimately build confidence. (paragraph 6.236)

85. Chief officers should ensure that managers are fully trained on how to handle race grievances and the training should be focused on developing the skills to resolve workplace disputes as well as the grievance procedure itself. (paragraph 6.239)

86. Chief officers should measure managers' performance on resolving disputes through their performance and development reviews, where training and support needs can be identified and through which they can be held accountable for their actions. (paragraph 6.239)

87. Chief officers should review their forces' systems for dispute resolution to ensure that they provide a wide range of options for resolving workplace disputes at an early stage and that police officers are aware of and have access to these options. (paragraph 6.243)

88. The Home Office should consider giving police officers the right to complain directly to the Independent Police Complaints Commission about racism, subject only to the restriction that where possible they use the appropriate internal process as a first resort. (paragraph 6.251))

89. Chief officers should review their own confidential reporting policies and fully independent arrangements should be made available by 1 September 2005. Chief officers should encourage the use of confidential reporting for racism and provide full

protection for the service user. The facility should have a mechanism for onward reporting to the Independent Police Complaints Commission (IPCC) in compliance with the Public Interest Disclosure Act 1998. The IPCC should report to police forces, police authorities and the Home Office on the use of the system and the nature and location of such reports. The IPCC should monitor the system's use and accessibility, taking appropriate action in response to any findings. (paragraph 6.267)

90. We endorse the recommendations of 'Learning the Lessons' and recommend that all stakeholders take responsibility for accepting the recommendations addressed to them. (paragraph 6.304)

91. Police authorities should scrutinise their forces' use of disciplinary action against police officers, to enable them to monitor whether there is any disproportionate adverse impact on ethnic minority officers and to ensure that the force is complying with its employment monitoring duty. (paragraph 6.315)

92. The Association of Police Authorities should produce guidance to police authorities on monitoring police officer disciplinary cases, with regard to the Commission for Racial Equality's Code of Practice on the duty to promote race equality and related ethnic monitoring guidance. (paragraph 6.316)

93. The Association of Police Authorities and the Independent Police Complaints Commission (IPCC) should work together on monitoring police officer discipline to provide guidance for police authorities and local IPCC commissioners on how to monitor effectively without duplicating forces' work. (paragraph 6.317)

94. Police authorities should require their forces to report to them on the use of their confidential reporting facility, to enable authorities to monitor how the facility is used and its effect on complaints of racial discrimination. (paragraph 6.320)

95. Police authorities should ensure that they adopt the guidance contained in 'People Matters. Tackling Discrimination: Police Authority Oversight and Scrutiny of Grievance Procedures and Employment Tribunals' and have due regard to the Commission for Racial Equality's Code of Practice on the duty to promote race equality and related ethnic monitoring guidance. (paragraph 6.322)

96. Police authorities should ensure that their authority receives a report after every employment tribunal race case detailing the wider race equality impact of the case, lessons that the force has learned, and an action plan to address any changes in policy or practices as a result. (paragraph 6.326)

97. Police authorities should ensure that their authorities engage in effective dialogue and meaningful consultation with staff associations including black police associations and other staff groups about race equality issues. (paragraph 6.337)

98. Her Majesty's Inspectorate of Constabulary should include race issues in the inspection of professional standards for the 2005 assessment reports, and revise the Citizen Focus Framework accordingly. (paragraph 6.356)

99. Her Majesty's Inspectorate of Constabulary should require evidence from forces in the 2005 baseline assessment process to demonstrate effective confidential reporting procedures, which offer confidentiality and support to officers reporting incidents of racial discrimination. (paragraph 6.358)

100. In the 2005 assessment reports, Her Majesty's Inspectorate of Constabulary should include race issues in the inspection of how forces handle grievances and employment tribunal race cases and revise the Resource Use Framework accordingly. (paragraph 6.365)

101. Her Majesty's Inspectorate of Constabulary should consult staff associations more closely and effectively to develop the baseline assessment process. (paragraph 6.368)

102. Chief officers should make sure that forces comply with the employment monitoring duty, taking into account the Commission for Racial Equality's Code of Practice on the duty to promote race equality and ethnic monitoring guidance. (paragraph 6.394)

103. Chief officers should ensure that the results of employment monitoring data are published in the force's annual report and on the force website. (paragraph 6.397)

## **Performance Development Reviews**

104. The Home Office (if necessary with its Race and Diversity Learning and Development Programme Board partners) should require evidence-based reporting for core competencies such as fostering or promoting respect for race and diversity and the 'Respect for Race and Diversity' behaviour. (paragraph 7.13)

105. The further guidance on Performance Development Reviews promised by the Home Office in the Race and Diversity Learning and Development Programme should identify and require best practice within forces in the area of race and diversity. (paragraph 7.14)

106. The prospective guidance to be produced by the Home Office and its Race and Diversity Learning and Development Programme (RDLRP) partners on the Performance Development Review process should address the monitoring and correcting of racist behaviour as well as learning and development issues. (paragraph 7.22)

107. The Home Office and its Race and Diversity Learning and Development Programme partners should also monitor forces' adoption of this guidance. (paragraph 7.22)

108. Chief officers should ensure that the outcome of any disciplinary tribunals for racial misconduct should be recorded within the Performance Development Review. Depending on the extent to which the PDR and competence-related threshold payment are related, it should be taken into account and where appropriate, such payment should be withheld until the officer has demonstrated improvement. (paragraph 7.22)

109. Her Majesty's Inspectorate of Constabulary and police authorities should inspect and scrutinise forces thoroughly to ensure that they adopt a consistent and coherent Performance Development Review system that deals effectively with racist behaviour. (paragraph 7.22)

## **Governance and accountability**

110. The Home Office should consider the possibility of rationalising the number of different units with overlapping responsibilities, including the possibility of merging the Police Leadership & Powers Unit and the Police Personnel Unit. (paragraph 8.15)

111. The Home Office, either working with relevant partners or on its own, should carry out a race impact assessment of any national policing proposal (including white papers) with a relevance to race equality, including policies emanating from the Home Office, the Association of Chief Police Officers, the Association of Police Authorities, Centrex and Skills for Justice. Any potential problems which are discovered by the impact assessment and accompanying consultation should be carefully addressed before the proposals become final. The results of such assessments and consultations should, under the Home Office's race equality scheme, be published. (paragraph 8.20)

112. The Home Office should ensure that all bodies with which it has funding arrangements as the 'sponsor department' are either themselves subject to the race equality duty or operate under the Home Office's own race equality duty and accompanying race equality scheme. (paragraph 8.20)

113. Any proposed agency with responsibility for the development and implementation of the setting of occupational standards, workforce modernisation and the delivery of all or aspects of the National Policing Plan is directly subject to the race equality duty or its work should be covered by the Home Office's (or any other sponsoring government department) race equality duty. (paragraph 8.21)

114. The Home Office should be an equal partner in any race impact assessment of national policing policies with relevance to race equality, including those developed by the Association of Chief Police Officers. (paragraph 8.33)

115. The Home Office should ensure that in any reform of police authority membership attention is paid to the need for race-based competencies. (paragraph 8.42)

116. Police authorities should ensure that they review their membership, and if there is a lack of representation of the local ethnic minority population, take lawful steps to encourage ethnic minority participation in their work. (paragraph 8.42)

117. Her Majesty's Inspectorate of Constabulary should continue to be responsible for the performance development reviews of chief constables in the area of race equality for the time being, with evidence required for the grading given. Her

Majesty's Inspectorate of Constabulary should actively seek the input of police authority chairs during this review. (paragraph 8.49)

118. Following a skills audit and training needs analysis of police authority members and chairs, and with relevant training then provided to meet any identified training needs, the Home Office should review whether or not police authorities are equipped to take on this role, with the continued advice and support of Her Majesty's Inspectorate of Constabulary. (paragraph 8.49)

119. Police authorities should ensure regular consultation with their forces' staff and police support groups such as the Black Police Association and their staff associations, such as the Police Federation and Police Superintendent's Association to get feedback on race equality issues generally. (paragraph 8.49)

120. Alone or in conjunction with their forces, police authorities should ensure that they carry out a regular staff satisfaction survey in their police force on race-related issues. (paragraph 8.49)

121. Police authorities should ensure that race issues should be a standing item on the agenda for all police authority committee meetings. (paragraph 8.53)

122. The Home Office should consider including the Commission for Racial Equality and the Independent Complaints Commission in any list of organisations that may trigger interventions from the Police Standards Unit. (paragraph 8.67)

123. Her Majesty's Inspectorate of Constabulary should ensure that the 2004 baseline assessments with respect to race and diversity should not be used as a baseline for improvement for forces in this area of business. Instead, a new baseline should be set from the results of the first assessments using the new race and diversity assessment framework, fairness and equality framework and a revised professional standards framework. (paragraph 8.76)

124. Her Majesty's Inspectorate of Constabulary should ensure that the self assessment system is evidence based by dip-sampling and requesting corroborative evidence for implementation of the specific race equality duties, such as evidence of carrying out race impact assessments of and consultation upon proposed policies, or publishing employment monitoring data as required under the employment monitoring duty. (paragraph 8.78)

125. Her Majesty's Inspectorate of Constabulary should inspect compliance with all aspects of the race equality duty in its baseline assessments, including implementation of race equality schemes and the employment monitoring duty, and in doing so should follow the Commission for Racial Equality's publication *A Framework for Inspectorates*. (paragraph 8.82)