

‘An inspection into activism and impartiality in policing’
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Avon & Somerset PCC response dated 5 November 2024

It is essential that policing in this country is done without ‘fear or favour’. Not only must the police be impartial – to uphold the law and ensure a fair criminal justice process – they must also be seen to be impartial in order to maintain public trust and confidence.

Part of acting impartially is for the police to be free of political interference. This is particularly important for me in my role as Police and Crime Commissioner. Although I am in a political role, I am very conscious of my duty to respect and maintain the operational independence of the Chief Constable.

This is a very important topic and this report sets out national recommendations as well as recommendations for Chief Constables, to which this response relates.

It should be noted that I have a legal duty to respond to inspection reports within eight weeks of their publication. However, the Constabulary have longer to address these recommendations.

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.

Response

The Constabulary is currently waiting for the revised authorised professional practice which is expected in July 2025.

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.

Response

The Constabulary will review their own policy in light of this recommendation and will then consider how best to communicate this to their workforce to ensure it has been understood and is adhered to.

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.

Response

Guidance on how to complete equality impact assessments (EIA) is currently available on the Constabulary's intranet. The template for EIAs is being reviewed to ensure it is user friendly and provides enough guidance on completion.

College of Policing training was provided to 40 staff within the Constabulary's HR team in 2023. The plan is to ensure that the learning from this is provided to other staff completing EIAs. This will include those running events, change programmes and community engagement as well as staff reviewing policies and procedures.

A central Constabulary team retain copies of EIAs. But the Constabulary are looking into strengthening the governance around EIAs to ensure they are used in a meaningful way.

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.

Response

The Constabulary's policies/procedures are periodically reviewed by the owners of the individual policy/procedure. Before publication, the legal services team review these against relevant legislation including Human Rights Act 1998 and Equality Act 2010 and ensure policies/procedures are legally compliant and uphold the aims of the public sector duty.

Guidance and templates around the creation, review and updating of procedures are available on the Constabulary's intranet site and this includes guidance on the Equality Act. Policies/procedures should also have a related Equality Impact Assessment.

The Constabulary have a central team with organisational oversight of policies/procedures to ensure that process are followed and documents are reviewed in a timely manner.

In addition, a policy research group was set up in August 2024 which includes HR, legal, and staff networks. The group meet every quarter to 'horizon scan' for any new legislation and changes to legislation.

The People and Organisation Development (P&OD) Directorate – which holds the majority of workforce related procedures – established a Procedure Review Group in February 2024. This group also includes legal services and the central management team who meet fortnightly to review outstanding procedures and drive the work forward.

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.

Response

The Constabulary will agree a new policy for non-crime hate incidents and will communicate this to the workforce once it has been completed.

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.

Response

Frontline officers have had training with regards to non-crime hate incidents. Crime recording staff check and test hate crimes and non-crime hate incidents to ensure these are being recorded correctly.

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.

Response

Hate crimes are reviewed by team supervisors as part of on-going crime reviews every 28 days. The Constabulary also have crime review officers for hate crime – who review three crimes every two weeks – who report on common themes and trends.

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.

Response

The Constabulary are currently considering their position on this recommendation but once a decision has been made a policy will be written accordingly.

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.

Response

Staff Networks currently have an allocated budget from the Constabulary's Organisational Development department; this includes a separate budget for the Constabulary's Race, Equality and Cultural Heritage Network (formerly the Black Police Association). To date, these are relatively small amounts of money that are used for things such as attending conferences, buying promotional materials and paying for external speakers. There is currently no formal process for requesting this funding.

The Constabulary will review the process for staff networks to request funding to support their activities to ensure it is fair, equitable and transparent.

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