# Independent Review Group on Equality, Diversity, Inclusion and Human Rights - Final Report

# 1. Introduction and background

1.1 This is the final report of the Equality, Diversity, Inclusion and Human Rights Independent Review Group (IRG), established by Police Scotland in 2021. It follows two progress reports in September 2021 and September 2022 and two interim reports in May 2023 and October 2023.

1.2 The establishment of the IRG came about in response to recommendation 18 of Lady (formerly Dame) Elish Angiolini’s Independent Review of Complaints Handling, Investigation and Misconduct Issues in relation to policing.

1.3 Recommendation 18 of the Angiolini review stated that Police Scotland should be the subject of a broader fundamental review of equality matters by an independent organisation. The recommendation also said that the review should consider HMICS’s proposed inspection of training and development that is to concentrate on the recruitment, retention, development, and promotion of under-represented groups.

1.4 In a report to the Scottish Police Authority (SPA) in November 2020 following the publication of the review, the Chief Constable indicated that Police Scotland would commission additional external and expert support. The IRG met for the first time in May 2021 and reported to the SPA on its terms of reference and the development of a bespoke set of outcomes.

1.5 The terms of reference state that the purpose of the Independent Review Group (IRG) is to act as a critical friend and partner supporting Police Scotland to deliver sustainable improvement to Equality, Diversity and Inclusion (EDI) outcomes across the service. The IRG will provide informed scrutiny of Police Scotland’s EDI activity by offering expertise, guidance, critical oversight, challenge, review, and assurance. The IRG will report their findings publicly.

1.6 The membership of the group comprises up to 12 people, independent of Police Scotland, with experience of advocating for underrepresented communities and of delivering equality and diversity outcomes in academia and in the public, private and third sectors. There has been some turnover in the membership of the group since its establishment and at the time of reporting it has nine members. Robin Iffla and Chris Creegan have been Chair and Vice-Chair since the outset and Pheona Matovu has been the second Vice-Chair since 2022.

# 2. Context and environment

2.1 Our review has taken place ten years after the creation of Police Scotland. The legacies of its predecessor forces and the transition which followed, particularly the evolving leadership culture, have been frequently cited in the conversations we have held.

2.2 In our interim reports we have also referred to a range of broader contextual factors including the impact of demographic changes in the police workforce and about the impact of the increasing fragility of public services on the nature of policing. Related to the latter factor we have underlined the impact of fiscal constraints of financial investment in the service, including capital spending and further pressures on local policing.

2.3 We have also referred to key developments within and around the service of relevance to the terms of our review, notably the Rhona Malone case and the Sheku Bayoh inquiry.

2.4 The murder of Sarah Everard took place shortly after the establishment of the IRG and heralded a constant stream of news about the Metropolitan Police Service which was both impossible to ignore and of broader relevance to our work. The review of culture within the Metropolitan Police Service led by Baroness Casey was ongoing for a large part of our review period, culminating in the publication of her report in March 2023.

2.5 The historic acknowledgement of institutional racism and discrimination within the service was made by the former Chief Constable on the day we presented our first interim report to the Scottish Police Authority. We discussed our response to his statement and its impact within the service in our second interim report. It is, of course, of central relevance to our review and the level of assurance we are able to provide on the service’s progress in relation to EDI & HR and anti-discrimination. The statement of the former Chief Constable was reaffirmed by Chief Constable Jo Farrel within days of her taking up her current post as Chief Constable of Police Scotland.

2.6 We do not intend to explore these contextual factors further in this report as we have already done so in our two interim reports. However, it is important to acknowledge the internal and external environment in which our review has been conducted and the relationship of these factors to the challenge facing Police Scotland as it seeks to drive culture change.

# 3. Our approach

3.1 At the outset of its work, the IRG sought to develop a set of outcomes which aligned with the objectives and vision of Police Scotland to assist the service to deliver on its EDI agenda. Those outcomes centred on culture change, strategic direction and training and development, specifically that:

* Police Scotland has a clear diagnosis of existing cultures and behaviours and their impact, and a robust understanding of what successful cultural transformation would look like and how to achieve it.
* Police Scotland has a clear Equality, Diversity and Inclusion Strategy with measurable outcomes, the delivery of which is embedded in the service.
* Police Scotland has an Equality, Diversity, Inclusion and Human Rights Strategic Oversight Board (SOB) that identifies best practice, continually reviews policies and procedures and drives innovation to promote Equality, Diversity and Inclusion throughout the organisation.
* Police Scotland has a comprehensive training development plan at every level of the service which drives culture change, supports the effective implementation of its EDI strategy as well as deepening awareness among all staff of EDI and anti-discrimination issues in relation to everyday practice.

3.2 As the implementation phase of the group’s work progressed, it identified seven proxy themes which informed our evidence gathering. These themes, which are not mutually exclusive, are:

* Governance and Oversight
* Dealing with Complaints and Grievances
* Policies and Practice
* Learning, Training and Development (LTD)
* Vetting
* Role of Middle/People Management
* Recruitment, Retention and Promotion

3.3 While EDI & HR has remained the core focus, understanding the efficacy of strategy development and delivery requires a wider look at systems and processes within any organisation, particularly one of the scale and complexity of Police Scotland.

3.4 It is important to note that while this report forms the concluding assessment and observations of this phase of the IRG’s work, the IRG has had the opportunity to engage and act as a critical friend on many aspects of work, including the overall Policing Together strategy, specific LTD developments and materials and on the development of specific strategies and policies that have been brought to the group to date.

# 4. Methodology and reporting framework

4.1 Our methodology and the reporting framework has evolved during the review. Much of our detailed fieldwork has taken place within three sub-groups focused on strategy; learning, training, and development; and culture. These areas overlap, of course, and to aid the consistency of our approach the membership of those groups has overlapped.

4.2 At the outset, each sub-group worked with a set of strategic questions. As the work has developed the fieldwork has pivoted towards the seven proxy themes described above. Where appropriate, bespoke topic guides have been developed for different sets of interviews and observations.

4.3 Our fieldwork and analysis included:

* Interviews with a range of senior officers and staff at DCC, ACC, Chief Superintendent, Director and Deputy Director level, including relevant function heads.
* Interviews with representatives of all trade unions including the Scottish Police Federation, Unite and Unison.
* Interviews with representatives of all diversity staff associations.
* Four divisional site visits (three geographical: Dumfries and Galloway, Highlands and Islands, and Lothian and Borders plus Operational Support Division, Armed Policing) which included one to one and group interviews with officers from Chief Superintendent to Constable.
* Ongoing attendance and participation in the Policing Together Strategic Oversight Board.
* Attendance and participation in various groups of probationer training
* Attendance and participation on Empower Hours.
* Attendance at an information day provided by a range of managers from Learning, Training and Development.
* Discussions with Insight colleagues.
* Review of a wide range strategy documents and reports including but not limited to the Policing Together strategy, the People Strategy 2018-21, the Violence Against Women and Girls Strategy, the Baseline Human Rights Assessment, the previous EDI Action Plan and the EDI Employment Framework.
* and development documents including FLM Guidance Handbook; OSD Policing Together Training & Awareness Delivery Plan; YLM Course structure and quarterly evaluation (July 2023); Evaluation of Valuing Difference and Inclusion Workshops; PS Learning and Development Discovery Phase report January 2023; mandatory e-learning module and EDI Moodle Evaluation feedback.
* Review of HMICS reports on Organisational Culture, Learning, Training and Development and Vetting.
* Review of Baroness Casey’s review into the standards of behaviour and culture of the Metropolitan Police Service.

4.4 Throughout this report we have used the acronym EDI&HR for equality, diversity, inclusion and human rights when referring to the development and delivery of Police Scotland’s strategy. We are using it as an umbrella term which also covers issues and initiatives related to specific groups and anti-discrimination work across the service, for example on anti-racism and violence against women and girls. In taking forward their work in this area, Police Scotland should ensure that they have a clear focus on anti-discrimination. We have provided two appendices to this report which provide a critique of this approach which we hope will be helpful to the service in the ongoing development of this strategy and what follows:

* **Including Lived Experiences**: This paper discusses the importance of including lived experiences to inform EDI&HR and anti-discrimination training. The paper explores the benefits but also outlines areas of concern when considering the topic of lived experiences.  (see Appendix 1)
* **Having conceptual and functional clarity in delivering for social justice**: This paper argues that an EDI approach is not sufficient if the aim is for the Police Scotland workforce to have the knowledge and confidence to address personal, cultural and institutional discrimination. It is important an anti-discrimination approach is explicitly discussed and understood. The paper also provides suggestions which Police Scotland EDI and HR training should consider if the service is to be anti-racist and able to address issues of systematic institutional discrimination for the nine protected characteristics and in the area of social class.  (see Appendix 2)

4.5 Following discussions with Police Scotland early in our review process, two members of the IRG have also conducted a separate deep dive on violence against women and sexism and misogyny. This is the subject of a separate report which includes details of the fieldwork and analysis undertaken. However, an overview of the evidence is provided in this report alongside the overview of the evidence in relation to each proxy theme. Where relevant we have also drawn on some of the findings of the work elsewhere in this report.

4.6 During our review, Police Scotland commissioned a baseline review of human rights, which identified both strengths and weaknesses, pockets of good practice and gaps in knowledge and practice. Work to take forward improvements on human rights practice should be considered in parallel with the findings in this report so they are seen as part of the same overall programme of work

4.7 Our initial focus on outcomes in relation to culture, strategic direction and training and development was developed to complement Police Scotland’s Equality Outcomes and EDI Employment Framework and align with the key strategic drivers for the service, including the Joint Strategy for Policing 2020 objectives and the People Strategy 2018-21.

4.8 We recognised from the outset that Police Scotland was on a journey with regards to its EDI & HR strategy, the core focus of our review, and that our ultimate reporting framework would need to be adapted to the changing strategic context. Since the establishment of the IRG, there have been several key developments which have informed our ultimate approach and reporting framework.

4.9 In December 2021, Police Scotland approved the creation of a single EDI Action Plan. An oversight group was established in February 2022 to oversee progress and report to its EDI & HR Strategic Oversight Board (SOB).

4.10 In September 2022, Police Scotland launched Policing Together, for the period 2022-26, complemented by an implementation plan which sets out how the strategy’s 21 commitments will be delivered. Policing Together provides a framework for oversight and coordination; it is not a delivery vehicle in and of itself. The EDI Action Plan was subsumed under the implementation plan and oversight of implementation and delivery assigned to the Policing Together Strategic Oversight Board which met for the first time in January 2023.

4.11 In May 2023, the former Chief Constable, made a statement to the Scottish Police Authority acknowledging institutional racism, sexism, misogyny, and discrimination in the service. The Chief Constable asserted that publicly acknowledging these institutional issues was essential to the service’s absolute commitment to championing equality, becoming an anti-racist service and its determination to lead wider in society.

4.12 Recognising that Policing Together is the primary vehicle coordinating the delivery of EDI & HR within the service, we sought to adapt our reporting framework to focus on its delivery. This was important in light of the early findings outlined in our first interim report which highlighted the operationalisation of the strategy remained a significant barrier to progress.

4.13 In light of the former Chief Constable’s statement and the timeline of the strategy, we determined that the core focus of our final report must be to provide assurance on the extent to which the pace and efficacy of the initiatives that sit under the Policing Together umbrella, match the commitment made in the statement. However, given our commitment to act as a critical friend to Police Scotland, we also recognised that the report would need to provide advice on how the pace and efficacy of delivery might be enhanced where appropriate during the lifetime of the strategy.

4.14 The reporting framework therefore has two frames of reference. The first references the level of assurance we can offer on the delivery of the strategy to date, bearing in mind that we are providing this report at the mid-point of the strategy’s timeline. We have captured this under three categories:

* Intent and commitment – the integrity of the service’s commitment
* Strategic framework – the development of the strategic framework
* Implementation and delivery – the pace and efficacy of implementation

4.15 The second references our view of the prospects for progress during the remaining period of the timeline. Finally with our role as a critical friend in mind, we consider what the service’s next steps should be in order to continue with progress on this agenda.

4.16 Further discussion of our rationale for the development of the reporting framework was outlined in our second interim report.

# 5. Our overarching assessment

5.1 Police Scotland has invested significant time and resources in a wide range of initiatives that aim to promote equality, diversity and inclusion, and address issues of discrimination in the service. We have had the opportunity to engage in, and with, many of these e.g., sitting in on probationer’s EDI training, having early sight of EDI Moodle training packages and engaging in detailed discussions on areas such as dealing with misconduct and vetting.

5.2 Policing Together represents an important step in joining up these initiatives. While its focus was initially more internally workforce focused, the various developments above and in particular the Chief Constable’s statement make this a timely moment to take stock and align with externally facing service delivery. Moving forward it is vital that Police Scotland is able to more clearly articulate aims and objectives that meet the aspirations of being an anti-racist and anti-discriminatory service, with a comprehensive set of benchmark measures to demonstrate the difference their initiatives are making.

5.3 We commend the progress that has been made and set out below some of the challenges and opportunities that will need to be addressed in order for Police Scotland to be able to fully deliver on their EDI and HR aspirations.

## Intent and commitment

5.4 There has been a demonstrable commitment from the Chief Constable and the senior leadership team to the strategy as evidenced by the historic and unprecedented acknowledgement of institutional racism and discrimination within the service. In making this acknowledgement, the leadership of the service has demonstrated that it understands that its systems and processes are institutionally discriminatory and that a meaningful commitment to the implementation and delivery of Policing Together starts with that acknowledgement.

5.5 We discussed this commitment in our second interim report including the significance of the service making the acknowledgement itself as distinct from it being our judgement or that of another review or inquiry. We have encountered unanimous support from the leadership team for the statement, including the continuity of leadership provided by the new Chief Constable’s re-affirmation of that commitment on joining the service. This has underlined our view that the acknowledgement is emblematic of a level of ownership which will enhance the ability of the service to make progress and that recognising the scale and nature of the problem can be an accelerator for change.

5.6 The development of the Policing Together strategy itself is a significant step forward. At the outset of our review, despite the commitment demonstrated in its Equality Objectives and the EDI Employment Framework, the service did not have a comprehensive overarching EDI&HR strategy. In our view the development of Policing Together provides further evidence of the leadership’s commitment.

5.7 We welcomed the creation of a dedicated senior leadership role and team to drive delivery in our first interim report and urged Police Scotland in conjunction with the Scottish Police Authority to ensure that this senior resource is supported and protected and considered in succession planning.

5.8 In our second interim report we noted the possible merger of the portfolio with the ACC Police Partnership and Community Wellbeing (PPCW) portfolio and our concerns that this might dilute the focus on the EDI & HR agenda. Given the developments that have taken place since, including the role being temporarily vacant, it is a timely

opportunity to review the overall aim and objectives of Policing Together to ensure that the right level of resource is put in place going forward.

5.9 There has been good progress in relation to the overall intent and commitment from Police Scotland’s leadership, which needs to be reinforced and sustained in terms of implementation and delivery. The drive and focus of the senior leadership team in collaboration with the SPA’s Policing Together Oversight Group will be critical here.

## Strategic Framework

5.10 Further work is needed on the development of a clear narrative and set of outcome measures for Policing Together. A theory of change and/or logic and impact model would greatly benefit the strategic framework. Work has been under consideration for some time on the development of models that are bespoke to Police Scotland and the Policing Together strategy. This is critical to underpinning strategic direction and enabling effective oversight of a prioritised programme of work. However, it is not, of course, a substitute for action.

5.11 Police Scotland needs to consider the relationship between the centre and divisions/departments. There is a balance required between setting national programmes of work such as the Values Campaign, or Inclusion Moments, established by and led from the centre and enabling delivery against local needs and circumstances. Policing Together provides a framework for oversight and enablement, but implementation and delivery cannot be driven from the centre alone. In building the capability and capacity of the core team, further consideration also needs to be given to how it can continue to build on and harness local expertise to ensure implementation is owned on the ground and priorities are relevant to divisions and departments.

5.12 Good progress has been made on streamlining and aligning the oversight arrangements, which signal a shift from transactional to strategic. The Strategic Oversight Board (SOB) still feels too large and defaults to the provision of updates on activity and exchanges of information. The development of the SOB substructures including the Tactical Group are a positive development, with further progress needed to streamline its focus and ensure that there is no duplication of effort.

5.13 As stated above, the initial focus of Policing Together was primarily internal. However, we have observed a shift in focus that will require getting the balance of external and internal engagement right, both at the centre and locally. The acknowledgement of institutional racism and discrimination was a necessarily outward facing moment for Police Scotland nationally and, while not part of the original intention, the wider leadership they have played engaging in the ensuing discussion and debate across other sectors is commendable. To be credible in doing so, it must focus on driving culture change within and on ensuring strong community relations locally.

5.14 There have been significant efforts recently to try to align the EDI & HR elements of a wide range of organisational strategies under the Policing Together umbrella. At the time of writing there are numerous new strategies on the horizon, e.g., People; Workforce; Learning, Training and Development; and Community Wellbeing. Policing Together provides an opportunity to set out clearly the culture, attitudes, and behaviours it is trying to achieve and then ensure that all the strategies and plans under its umbrella work together to drive this forward. This oversight function should also be used to challenge new strategies and policies to ensure they are Equality and Human Rights Impact Assessed, with clear deliverables and clear outcome measures.

5.15 There has been some progress on the collection, disaggregation, and use of equality data. We have not managed to see a clear presentation of all the data that is currently collected with an explanation of why it is being collected. This would be a helpful first step in pulling together a clear and comprehensive plan for effective impact measurement going forward.

## Implementation and Delivery

5.16 As stated at the start of this section, we have had the opportunity to engage in a wide range of programmes and initiatives that sit under the Policing Together programme, being delivered by different parts of the organisation, be that national, local or through networks such as Diversity Staff Associations. In our first interim report we raised concerns about the large number of programmes and initiatives having the potential to overwhelm the system, a lack of clear priorities and many initiatives lacking clear outcome measures. Until these issues are addressed, we remain very concerned about the pace and efficacy of the implementation and delivery of the Policing Together strategy.

5.17 Equality mainstreaming offers an opportunity to embed EDI and HR considerations in the development and delivery of the work of all of Police Scotland. This is another area where further progress can be made and will support the objectives of Policing Together being embedded in day-to-day service delivery, as well as in the component parts of strategy delivery essential to enabling that, e.g., Your Leadership Matters.

5.18 The capacity and capability of middle managers, in particular at Chief Inspector, Inspector and Sergeant level is critical to the effective operationalisation of the strategy. Police Scotland has recognised that it has not properly supported the development of this group to date and have therefore invested in the People Manager Development Programme (PMDP), which launched in October 2023.

This is an important programme that will benefit from the work now underway to embed EDI&HR in its delivery.

5.19 The response to the acknowledgement of institutional racism and discrimination across the service did reveal some resistance to strategic commitment on the ground, including amongst some managers. In particular, we heard concerns that in some instances those with protected characteristics have had to challenge those who do not.

## Ability to achieve progress

5.20 We have set out above our broad assessment of where we think Police Scotland is on this journey. There has clearly been a lot of progress but significant challenges remain, including the need for prioritisation, evidence and progress on mainstreaming. This, alongside the external environmental and financial challenges and internal staffing changes leave us uncertain at this stage about the service’s ability to achieve the progress required. We set out in the section on Next Steps at the end of this report the actions that we believe will help secure certainty in achieving progress. It is important to note that in assessing the evidence we have gathered across the seven proxy themes, we found areas where we believe its ability to achieve progress is promising, including Complaints, Grievance and Disciplinary and Vetting and no areas where we believe Police Scotland’s ability to achieve progress is poor.

5.21 Reading across the evidence from the seven proxy themes which is summarised in the next section of the report there are several shared factors that contribute to this uncertainty including: lack of evidence of sufficiently embedding the commitment and strategy in the everyday practice of the service (though recognising that elements of this programme are longer-term culture change); the potential continued impact of resource constraints and shifting priorities; and some capacity and capability issues across the service across a range of functions and levels.

5.22 The acknowledgement of institutional racism and discrimination within the service that was previously referred to, was an unprecedented and historic moment. Within UK policing and the Scottish public sector, this acknowledgement has been sector leading in the work on challenging racism. We remain of the view that this underlined the integrity of the leadership’s commitment to transform the culture of the service and that it has the potential to be an accelerator for sustainable change.

5.23 The shift from intent to impact that is demanded will require a continued openness to challenge and scrutiny. In practice, despite the support and access we have been provided with during this review, we have experienced at times a somewhat defensive culture. Our experience echoes some of the commentary in the HMICS inspection on culture.

5.24 In finalising our report, we have taken the opportunity to enter into a dialogue with those responsible for leading the Policing Together strategy. We are aware that there is a risk that our commentary may be seen as solely or primarily about their leadership. This is not the case. Our commentary relates to the progress of the service as a whole. We cannot stress strongly enough that while dedicated capacity and capability at the centre is crucial, leadership of this work must be a shared endeavour across the service and at every level. It cannot be left to a few key individuals.

5.25 We have carefully considered the feedback we have received and where appropriate made amendments to the commentary on evidence and assessment which follows where progress is ongoing. While this has not involved a revision of our overall assessment, it is important to acknowledge that this is in part because some aspects of implementation are at an early stage and therefore the outcomes are simply unknown. We have been asked for ongoing practical advice from the IRG and in addition to our recommended next steps, provide this in advice relating to Learning and Development (see Appendix 3) and have considered this in our reflections and advice to Police Scotland on the future of the IRG.

# 6. Governance & Oversight

## Overview

6.1 This section focuses on the oversight mechanisms, structures and processes that have been put in place to drive forward the Policing Together programme. Our evidence gathering and assessment has been based on discussions with senior leaders in Police Scotland, representatives of Police Scotland’s Diversity Staff Associations and the SPA.

## Evidence and Assessment

6.2 We view the development of the Policing Together Strategy and the dedicated resources, including the creation of a senior leadership role, as a positive and necessary development for delivering on Police Scotland’s EDI and Human Rights ambitions. The SPA has also prioritised this agenda through the establishment of an Oversight Group.

6.3 Policing Together has been an evolving programme of work, based on drawing together and aligning a number of inter-related strategies and work programmes, including: Learning, Training and Development (which is itself owned by different members of the senior leadership team); Human Resources; Community Wellbeing; Professional Standards; and EDI specific workstreams.

6.4 We talked in our first interim report about too many initiatives and not enough measurement of what difference they are making. Many we spoke to felt overwhelmed with initiatives, lack of joined-up messaging and lack of coordination or prioritisation. Progress has been made in aligning and ‘deconfliction’ activity across these various strategies and initiatives. This work is important and needs to continue in order to establish a clear, shared and prioritised programme of work.

6.5 From our interviews across the senior leadership team following the Chief Constable’s announcement, there was clearly a shared view that this was the right thing to do, but questions were raised about next steps and priorities. Leaders have raised some concerns about the numerous strategies in development (e.g., People, Workforce, LTD, Community Wellbeing) which risk creating silos and a lack of focus on the overall resources needed to deliver these. HMICS Culture report goes on to say that ‘the Police Scotland Executive is viewed by many as a collection of competing individuals and not always a cohesive group’. The delivery of the aims and objectives of Policing Together are at risk without full buy-in and engagement across the senior leadership team. This 2-year mid-point is a good opportunity to ensure this is achieved.

6.6 Work has been done to refresh and streamline internal Policing Together governance and oversight structures. These include the establishment of a Policing Together Tactical Group (PTTG) to help streamline the business flowing through to the Strategic Oversight Board (SOB) from the four main sub-groups. The SOB now sits six-monthly with the PTTG and its four sub-groups sitting quarterly. This streamlining is sensible and welcome and should continue in order to ensure the SOB is able to focus strategically and is focussed on overseeing a clear, measurable, and prioritised programme of work.

6.7 We believe Policing Together would greatly benefit from a clear logic or impact model and/or theory of change] This should be supported by a clear plan for gathering and analysing evidence of impact and outcomes, disaggregated by protected characteristics. Without these Police Scotland will struggle to demonstrate the difference their interventions are having on those they are intended to benefit.

6.8 Police Scotland’s Diversity Staff Associations are supported by the organisation and relied upon to provide a sounding board, expertise and lived experience across the development and delivery of many of the initiatives and strategies that underpin Policing Together. It is important that Diversity Staff Associations are properly resourced and supported to do so; not relied on for providing regulatory or legal expertise; that the emotional impact of sharing their experiences is understood; and that they are not considered as fully representing the views of the communities that Police Scotland serve.

6.9 It is not clear if there is a shared understanding of what Police Scotland wants from their Diversity Associations and networks. The establishment of a single group to bring forward their voices in one place is a good development and it may also be timely to reflect on and review the Terms of Reference for each.

## Ability to achieve progress

6.10 There has been promising progress overall in establishing the mechanisms to drive forward Policing Together. In order to continue with this progress, there needs to be sustained prioritisation of this agenda in the face of competing priorities and a challenging financial environment. New pieces of legislation on the horizon including on Code of Conduct and Human Rights will all place additional demands, cost and prioritisation, as has been seen recently with the changes in Hate Crime legislation and the implications for recording of incidents.

6.11 The investment in an ACC role as an Executive sponsor and the resourcing of a small supporting team is welcome. This needs to be bolstered with the skills and expertise to deliver a large-scale organisation wide coordination role such as a Project Management Office (PMO) function, supported by effective monitoring and evaluation of impact. Adding the Police Partnerships and Community Wellbeing portfolio to Policing Together has potential pros in terms of external community engagement and cons in terms of diluting focus at a time when the programme has not yet been fully consolidated. This mid-point in Policing Together’s 4-year strategy is an important opportunity to reflect on its aims and objectives and the resources required to deliver on these.

# 7. Complaints, Grievances & Disciplinary

## Overview

7.1 The IRG has not undertaken an in-depth assessment of Complaints, Grievances and Disciplinary policies and procedures, but we have engaged with the Professional Standards Department (PSD), the Vetting Team and local Divisions to understand how well the current system is able to respond to EDI issues in practice. HMICS’s recent Culture inspection provides relevant additional evidence that aligns with our findings.

7.2 We believe there has been good progress with the development of the overall strategy and implementation, with work still to be done on building confidence across the service in using the complaints system and capability on dealing with EDI issues, particularly for managers dealing with conduct issues on the frontline.

## Evidence and Assessment

7.3 There has been good work undertaken to set out clearly the behaviours, values and standards expected of the Police Scotland workforce, particularly through the Preventions and Professionalism programme. Recent developments, including the publication of misconduct cases, regular newsletter ‘The Standard’ and a campaign to highlight each of the ten professional standards, have seen significant engagement from the service. Next steps would include developing some measures to show what difference these are making e.g. surveying officers and staff to see if they have an improved understanding of standards and values.

7.4 There remains a hurdle in encouraging staff to speak up and report unacceptable behaviour. Staff have said they do not wish to be seen to ‘grass up’ and so any process has to ensure confidentiality, anonymity and also be seen (by possible complainants so they know something will happen) to be effective. Our first interim report discusses this in more detail, citing behaviour issues in plain sight and negative perceptions of the impact of reporting (e.g., the complainant getting moved, rather than the person complained about).

7.5 The move to grievance processes without any attempt to mediate appears to persist. This is time and resource consuming. There remains a lack of confidence and transparency and concerns about timescales for those raising complaints or grievances. HMICS have also picked up on a perceived lack of openness, transparency, fairness and pace of resolution in misconduct and grievance cases.

7.6 HMICS have also picked up on issues relating to data collection and Police Scotland’s ability to understand and address trends in complaints. They also identify, as we have, the priority need to record and disaggregate diversity data in the complaints system in order to understand if some groups are being treated less favourably than others.

7.7 We heard from some line managers about a lack of confidence and capability in dealing with EDI conduct issues by line managers. The points we have raised elsewhere and the work now underway to embed EDI and HR into management training should help address this.

7.8 The Professional Standards Department (PSD) has a key role to play on these issues and so should have access to more in-depth training and development on EDI and HR issues and how these manifest or are breached in workplace settings.

## Ability to achieve progress

7.9 As stated above, there has been some really good progress in this area, and we see things moving in the right direction. Uncertain in some regards e.g. the current levels of confidence of managers to deal with EDI issues; to promising, with the interest that has been generated on issues such as misconduct. Complaints, grievances and misconduct remain clearly in the public eye and in the priorities of the SPA which will help to drive forward improvements.

7.10 Focussing on EDI training and development for line managers and for Professional Standards Division staff, alongside the collection and use of disaggregated equalities data will be key to moving things forward. Work underway on vetting, described later in this report will also complement these efforts.

# 8. Policies and Practice

## Overview

8.1 This section offers a reflection on the extent to which the policies and practices that we have observed across our fieldwork support the delivery of a more equal and fair police service. We make specific reference to the current approach to Equality and Human Rights Impact Assessment (EqHRIA).

## Evidence and Assessment

8.2 Equality mainstreaming is the incorporation of a focus on equality, non-discrimination and diversity into all strategies and policies that inform the delivery of the work of an organisation, not just those that are considered to be most relevant (e.g., Human Resources). Mainstreaming is an effective way to ensure that the whole institution is delivering on its Public Sector Equality Duty (PSED). In Scotland, there is a specific duty for institutions to mainstream equality across their functions.

8.3 Police Scotland has an agreed approach, Equality and Human Rights Impact Assessment (EqHRIA), that is designed to ensure all strategies, policies and practices properly consider EDI and HR in their development and delivery. Impact Assessment is also part of the PSED. However, its application is used inconsistently. Strategies and policies are inconsistent in their consideration of EDI or Human Rights. We also heard some examples of where Police Scotland has got this wrong (e.g., Beards Policy) and the negative impact this has had. An EqHRIA at the outset would have helped to identify and mitigate these impacts.

8.4 Police Scotland has a very experienced team who work to support the development of strategies and policies through their EqHRIA approach. However, this approach feels as if it is too process driven, which some have said they feel is burdensome and bureaucratic, rather than being an enabling and outcome focussed tool. This is a common experience across the public sector. EqHRIAs are often undertaken at the end of the development of the policy or procedure and given to junior members of staff to complete, missing the point and indeed requirement of the assessment duty of the PSED.

8.5 There has been some good progress made on the development of online tools and engagement across different Divisions. We would recommend the focus going forward should be on the ‘so what’ and that the team gather and share information on what difference EqHRIAs make and how they can benefit. This information is not currently available.

8.6 There were some examples of senior buy-in and ownership of EqHRIAs, which could be used as areas of good practice to support and champion in other areas where this is not the case.

8.7 We have also heard from Trade Unions about the need for inclusive language in policies and practices in relation to Police Staff as distinct from Police Officers.

## Ability to achieve progress

8.8 Despite the efforts of the responsible team, progress in embedding impactful EqHRIA across the organisation has been slow. The current approach would benefit from an objective appraisal, given the time and resource that has gone into this work for the last 10 years or so. This is something the IRG would be able to support.

8.9 Diversity Staff Associations have said at times they feel overly relied on and at other times not engaged at all when consulting on the development of strategies or policies. It would be useful to agree a standard for this engagement going forward, as part of a review of the overall EqHRIAs approach. While Diversity Staff Associations will be able to offer a view on internal policies and procedures, communities that the policies will impact on in terms of service delivery will also need to be engaged.

# 9. Learning, Training & Development

## Overview

9.1 The commitment to Learning, Training and Development (LTD) across Police Scotland is clear with the expansion and maintenance of an LTD budget and the development of a new LTD strategy for 2024-2027.  Police Scotland is to be commended for viewing LTD as a way to embed the service’s values and ethics. As we have said above, there is still work to be done to properly mainstream EDI in relevant strategies and to be able to deliver a reflective, learning culture that will lead to meaningful change on the ground. Evaluating training content in itself is not necessarily a measure of progress, evaluation has to be focussed on the extent to which the training has achieved its intended outcomes or impact.

## Evidence and Assessment

9.2 In our first interim report we reported on stretched resources on the frontline having a detrimental impact on culture. Inadequate numbers of officers, already stretched to capacity and working in highly stressful situations, is not conducive to a reflective, learning culture where officers and staff can thrive and respect one another. Internal blocks also manifest in some with leadership and management responsibilities being reluctant to change through training and development and ascribing to a ‘canteen culture’ that condones discrimination and prejudice. This coupled with a lack of confidence or willingness to ‘manage for equality’ within middle management will impact on workplace cultures and progress on EDI and anti-discrimination matters.

9.3 We commend the Leadership and Talent team within People Development as well as the Learning, Training and Development team that EDI work is becoming increasingly central and embedded. For example, the review of all lesson plans within the LTD remit covering Probationer Training and Specialist training to ensure EDI is threaded throughout is welcomed. The intention being that all officers do not receive a one-off training programme but find they are engaged in considering EDI over the course of all training received over their years of service. The additional week added for Probationer training is particularly welcomed in this climate of restricted resources and gives greater possibility of ensuring EDI is properly covered and mainstreamed.

9.4 The modernising of Probationer training to include areas like trauma training, behavioural training and resilience training are all important aspects to bolster EDI and anti-discrimination training. A specific lesson on the History and Ethics of Policing covering Scotland’s role in slavery as well as other historic points impacting on policing, which is currently being developed, will enable participants to move beyond seeing these issues only at a personal level.

9.5 Our review showed that probationer experience of EDI input is varied, and the depth and rigour are dependent on the confidence and capability of the trainers.  Some trainers confidently engage with a range of EDI issues while others do not. Training would also benefit from lived experience (of protected characteristics) among trainers, especially around anti-racism and misogyny.

9.6 The IRG is pleased to have been able to initiate the establishment of a forthcoming research project to understand the experiences of probationers over their 2-year probationary period. The project experienced a slight delay due to a recruitment and training pause which impacted the service between December 2023 and January 2024. Steps are now being taken to recommence conversations to identify participants and arrangements are in hand to refresh the Data Protection Impact Assessment for the Engagement Hub, Citizen Space, which will be used to host the research activities.

9.7 The Your Leadership Matters programme focuses participants on a range of behaviours and values such as the need to seek out diverse perspectives, to ensure under-represented sections of the workforce feel at the heart of their teams and to model best behaviour.  Each event has a senior sponsor and guest drawn from within the service which is often where EDI matters are also discussed.

9.8 The PMDP programme also has an EDI focus woven through the programme, focusing on different diversity strands with different emphasis depending on context, for example, for disability discrimination during the Attendance Management & Duty Modification input.  PMDP now includes a Deconstructing Institutional Discrimination empower hour and case studies containing a range of discrimination behaviours to assist participants discuss appropriate leadership responses.

9.9 Other institutional changes to practice are being introduced to ensure greater equity such as the introduction of reasonable adjustments for the oral exam when English is not the first language as well as proactive support for probationers from racialised and minoritised communities through the newly established Probationer Governance Unit are again welcome steps.  The Accelerated Leadership Pathway (ALP) which is designed to identify and attract leaders of the future have approached diversity staff associations to assist in diversifying the talent pool and newly promoted Chief Superintendents (often referred to as Divisional Commanders) also includes a half-day EDI workshop covering a combination of Allyship/Unconscious Bias and Transforming Culture.

9.10 The draft LTD strategy (2024-2027) - which is still being consulted upon as this report is being written and on which the IRG provided feedback - is comprehensive. The strategy clearly outlines Police Scotland’s intention to be a learning organisation; investing in continuous professional development and utilising a range of approaches (e.g., face to face, online and hybrid); the inclusion of voices of those with lived experience; and input by peers to encourage values into action. The strategy also places emphasis on enabling inclusivity of learning needs and that as a 24/7 emergency service, officers and staff need to be able to access learning at a time and place that suits them alongside having protected time to do so. A significant element of the strategy is dedicated to ensuring Police Scotland staff become digital natives and are confident with using technology for learning.

9.11 The Police Scotland LTD strategy suggests that at present in order to become a fully effective learning organisation, there is a need for improved infrastructure, operating models, in-house expertise and an enabling culture that recognises LTD to be an investment and not an abstraction.

## Ability to achieve progress

9.12 We have identified a range of good progress and developments, many of which are recent, which are very promising. The single biggest driver for change should be the Chief Constable’s commitment to act on its self-proclaimed statement of being institutionally racist and discriminatory, which has been universally supported by the senior executive.

9.13 Budget constraints, competing priorities, workload issues all make for a financial and cultural environment that will be challenging for Police Scotland to expand the EDI training provision for probationary officers or to prioritise additional dedicated training on EDI for all serving officers and staff.  The priority has to be to embed EDI and anti-discrimination into existing training.

9.14 A tradition of ‘buying in’ EDI training programmes from other parts of the UK, rather than developing programmes that specifically meet the cultural and operational needs of Police Scotland may hinder the potential to change ‘hearts and minds’ of all police officers serving communities across Scotland where many forms of discrimination continue to exist.

9.15 A consistent harnessing of the expertise and lived experiences of Police Scotland’s Diversity Staff Associations will ensure these experiences are valued and support the impact of the Truth to Power sessions.

9.16 Clearer plans for analysing data and measuring impact of all EDI training (not just on numbers participating in training) will be an important next step to help meet Police Scotland’s strategic aims for EDI as highlighted in recommendation 1 of the HMIC Phase 2 Report on LTD in October 2021 that Police Scotland should develop timely, meaningful equality, diversity and inclusion data and the capability to analyse the data to identify and understand trends.

# 10. Vetting

## Overview

10.1 The IRG has not undertaken an in-depth assessment of vetting. However, we have engaged with the Vetting Team and with officers within divisions about Police Scotland’s progress in this area. We are also mindful of the HMICS assurance review of vetting policy and procedure which was published in October 2023.

## Evidence and Assessment

10.2 While there remain areas where action needs to be taken over the next one to two years, we found clear evidence of progress and improvement over the last two years relevant to the Policing Together Strategy.

10.3 A key underpinning development is the increase in capacity within the vetting team. It was very encouraging in the current climate to hear that a business case for increased resources had been successful, resulting in 16 new officers, a 47% increase in the size of the team. Crucially there was a clear recognition of the importance of diversity within the team and the positive effect this was already having on the team’s capability and effectiveness.

10.4 As we have said above in relation to PSD staff, Vetting staff also have a crucial role in ensuring that Police Scotland is staffed with people who have the right values and behaviours. To that end, enhanced training on EDI and HR should be a priority.

10.5 In 2022, Police Scotland enhanced vetting arrangements to ensure its systems were robust in identifying individuals who are unsuitable to work within policing. To ensure coherence, it has ensured due regard to the Vetting Code of Practice applied by police services in England and Wales. More than 23,500 officers and staff have been checked against databases since 2022. Risks identified are dealt with by Professional Standards using existing regulations.

10.6 Importantly, vetting is seen as part of a continuous improvement process. Police Scotland now publishes (internally) misconduct cases is part of a holistic process that vetting sits within. Non-police personnel, such as partners of police personnel, those providing services to the Police are also covered by vetting.

10.7 Vetting forms do not currently include monitoring by protected characteristics (as is the case in England and Wales) but work is underway to ensure that they do. This will provide the means to monitor to ensure that particular groups are not disproportionately affected and that vetting risk assessment does not adversely affect or benefit particular groups.

## Ability to achieve progress

10.8 We are mindful that the Casey review of the Metropolitan Police Service shone a clear light on vetting. It demonstrated its central importance to making progress on EDI&HR including recommending setting new, higher vetting and behaviour standards as well as putting in place robust re-vetting procedures.

10.9 The HMICS Assurance review highlighted gaps and areas for action. It is clear that the pace of improvement needs to be maintained in order to take forward the review’s recommendations. Of particular relevance are recommendations on dispensing with the service of those who cannot maintain vetting, review of designated posts working with vulnerable people, reporting of off-duty offences, reviewing vetting following misconduct and refusal, suspension or withdrawal of vetting.

10.10 We are confident that vetting is a high priority within Police Scotland. Taking all the evidence we have gathered and reviewed into account we believe Police Scotland’s ability to continue to make progress in this area is promising.

# 11. Middle and People Management

## Overview

11.1 Police Scotland has recognised that its’ manager cohort needs investment and a clear commitment has been made to deliver generic training for first line managers which includes leading and working in an inclusive way. We have identified elsewhere a lack of confidence and from managers in dealing with EDI and HR issues and so recent developments with the People Manager Development Programme described above are very welcome. Next steps should include some measure of how understanding of those participating has improved on EDI matters and how it has developed capability on EDI related matters.

## Evidence and Assessment

11.2 In our first interim report we discussed the huge weight placed on middle managers who are expected to take forward priorities from senior managers but also to ensure the day to day running, the wellbeing of officers and staff they manage as well as absorbing concerns from those on the ground are addressed.

11.3 Police Scotland’s commitment to developing the understanding and capability of middle and people managers recognises that they have a key role in shaping the culture of the organisation. This commitment is important given the apparent lack of investment to skill up those who lead and manage at this level to date.

11.4 Phase 1 of the Your Leadership Matters (YLM) Programme was completed in 2021 (mid-pandemic) by 250 officers and a current cohort of over 500 officers completed the programme in August 2023. While HMICS’s 2021 report on LTD stated that the programme had been well received and contains an emphasis on EDI throughout, we believe that there is more to be done to embed the right level of EDI and anti-discrimination into all aspects of the content. The IRG are well placed to support this.

11.5 The People Manager Development Programme (PMDP), which went live at the end of October 2023, focuses on wellbeing, confident leadership and Police Scotland’s values but does not include diversity and anti- discrimination as discrete themes. HMICS’s 2021 report recommended that Police Scotland should ensure that diversity training is provided and mainstreamed into leadership training courses at all levels.

11.6 We have been informed that the mainstreaming of EDI issues is now happening within PMDP and YLM programmes which is welcomed and essential for providing leadership and management in the area of EDI&HR and anti-discrimination.

11.7 As in many other public bodies, the language of EDI is often ‘cleaned up and sanitised’. Without an explicit naming and addressing of discrimination, with examples to enable managers, officers, and staff to address everyday discrimination and micro-invalidations, the intention to become an anti-racist and anti-discriminatory organisation will remain an aspiration. We suggest reading our Appendix 2 *Having conceptual and functional clarity* in delivering for social justice and in particular the section on Developing Racial Literacy.

## Ability to achieve progress

11.8 The capacity and capability of middle managers is critical to the successful operationalisation of Policing Together. Recent progress on training and development are welcome. In order to continue to make progress there are several challenges that will need to be addressed.

11.9 Time constraints, financial pressures, culture barriers and heavy workloads have the potential to derail the ambitions of Police Scotland to be an anti-racist and anti-discriminatory workforce. Progress on embedding EDI&HR will be impeded if some of these pressures are not alleviated. We do recognise that some of these are external pressures placed on Police Scotland, rather than of their own making.

11.10 We’ve seen some good recent progress in embedding EDI and HR into training and development programmes. IRG would be keen to support a robust mainstreaming of EDI, anti-racism and anti-discrimination into training for first line and middle managers. If Police Scotland is to be institutionally anti-discriminatory, then the training content needs to align with the organisational aspiration to be a service that dismantles racism, institutional discrimination and misogyny.

11.11 The weight of expectations on middle managers that we talked to, balancing taking forward senior management priorities coupled with having to deal with what is urgent and immediate, is a barrier.  More thought and support are needed on how to enable this level of managers to progress Policing Together priorities.

11.12 Steps need to be taken to ensure the EDI&HR training provided at Tulliallan is built on by line managers as probationers move to frontline policing. This would reduce the gap that the HMICS thematic inspection on organisational culture also identifies.

# 12. Recruitment, Retention and Promotion

## Overview

12.1 Recruitment, retention and promotion policies and practices are key to building a diverse workforce. Police Scotland has introduced a raft of processes in recent years. This section focuses on findings in relation to the application of those processes in practice, particularly promotion. It draws on fieldwork from our own review and finding in the HMICS review of organisational culture.

12.2 While there has been an increase in the proportion of officers who are women in the last decade, they remain just one third of the total, in contrast to two thirds of the police staff total.

12.3 From the data we have seen in Police Scotland’s Equality and Diversity Monitoring Report (2021-22) there was a small increase in the proportion and number of women in the promoted ranks of sergeant and above from 27% (993) at 31/03/2020 to 28% (1078) at 31/03/2022. The proportion and number of police officers in promoted ranks (sergeant and above) with a recorded disability has also saw a 1% increase from 2% (91) at 31/03/2020 to 3% (124) at 31/03/2022. The number of police officers in the ranks of sergeant and above identifying as BME increased from 44 at 31/03/2020 to 46 at 31/03/2022.

12.4 However, data for the period 1 April 2021 to 31 March 2022 in its EDI Mainstreaming and Equality Progress Report 2021-2023 demonstrated that female officers, black and minority ethnic (BME) officers and white minority ethnic (WME) officers were under represented as successful candidates in promotion processes, when compared with their representation in the service as a whole.

12.5 We have seen further cumulative analysis conducted by Police Scotland for the period 2020 to the present. This shows that while more males participated in the promotion process at each level (from Sergeant to Chief Superintendent) than females, females were as likely to be successful as male applicants at Inspector level and more likely at every other level. However, the difference was greater at Chief Inspector level and above than at Sergeant level.

## Evidence and Assessment

12.6 Despite some progress in the recruitment of staff from some under-represented groups over the last decade, we understand that there has been some attrition more recently. The extent to which this may be attributed to issues of workplace culture, discrimination or prejudice needs to be properly explored.

12.7 We heard that increasingly, younger recruits do not necessarily see the service as a lifelong career. However, there is insufficient exit interview data, and so this also requires further analysis and attention.

12.8 While we heard senior managers advocating for diversity of staff, there was not always a clear understanding of why greater diversity, and a more inclusive culture would benefit the service. This may link to the points above about the stage of progress of training and development for managers and the depth of their current levels of understanding and awareness.

12.9 HMICS has examined the promotion policy and the Equality and Human Rights Impact Assessment, and the inspection team’s view was that the *policy* is fair and equitable, and capable of providing the best opportunity for officers to succeed.

12.10 However, the HMICS also found that despite the fact that Police Scotland has reviewed its promotion *processes* over the last few years and, although they are deemed to have improved on previous iterations, these are still widely considered not to be as open, transparent, and fair as they should be.

12.11 It was reported that divisions and departments often bolt-on random and arbitrary local processes to the promotion policy, ahead of the service-wide process. These often require officers in specialist posts to return to operational policing roles before receiving divisional backing for promotion.

12.12 This can and does lead to officers choosing not to apply for promotion due to the impact of moving from one working pattern to another that will often not suit caring or other responsibilities, and not recognise the skills built up in the specialist post. We also heard that the emphasis on frontline and operational settings has a direct impact on disabled officers, including those with physical impairments and with neuro-diverse conditions in non-frontline roles who are unable to meet certain criteria.

12.13 HMICS found this to be an area of significant frustration, with officers losing faith in the system and failing to apply for promotion - thus reducing the diversity of the candidate pool.

12.14 During our review we heard repeatedly that “MyCareer” is seen as being only relevant to those who want promotion and therefore drives the wrong sort of culture (e.g., competitive, promotion defined as success) and behaviours (e.g., seeking evidence on competencies such as setting up pet projects, initiating unnecessary change, rather than doing your job well and driving improved behaviours and attitudes).

12.15 The HMICS culture inspection also refers to the disruption caused by adverse promotion-seeking behaviour. In contrast we heard that women officers could be less likely to complete reflection logs, putting themselves at a disadvantage. Senior managers spoke of the need for early Identification of talent, support, and encouragement to overcome this.

12.16 We also heard repeated concerns that it is easy to learn the language of the Competency Values Framework while not necessarily living it as part of everyday practice. This was echoed in the HMICS culture inspection which suggested the framework is poorly understood. Like HMICS, throughout the review we encountered a concern that the Framework is less relevant to those who have little aspiration to go for promotion.

12.17 This was combined with a view, also consistent with the HMICS inspection, that there has been insufficient focus on good people and performance management, nor on training and development for people managers. The systems and tools put in place to date (e.g., MyCareer, Moodle) are seen as inadequate with an over reliance on online platforms. The People Manager Development Programme should go some way to remedying some of these concerns.

12.18 We heard that there are limited opportunities for people to raise concerns about promotion. Conversely, line-managers and supervisors may be reluctant to challenge promotion readiness for fear of grievances arising.

12.19 The IRG parallel deep dive on VAWG, Sexism and Tackling Misogyny revealed a number of issues relevant to this theme including pervasive attitudes of misogyny and sexism across all areas and divisions of Police Scotland. These can contribute to a hostile environment for women who may choose to leave their careers early or to change career paths.

12.20 The deep dive also revealed ongoing discrimination (both real and perceived) and (self-) exclusion of women from promotional opportunities – particularly for women who are older, or newly married or who have children.

12.21 Respondents reported hostility towards women who achieve promotions (particularly those who are younger), with negative associations between sex/gender and ambition/professional competence and achievement.

## Ability to achieve progress

12.22 Based on the evidence and assessment, there are still a number of challenges Police Scotland need to address to achieve progress. There have clearly been some positive developments and an aspiration to ensure fairness in progression and promotion. Continuing to focus on developing the right workforce culture is essential alongside a review of key processes and tools including Competency Values Framework and MyCareer to ensure they support the organisation’s EDI and HR values and aspirations.

12.23 Our findings align with those of the HMICS that the Competency Values Framework is not yet properly embedded in practice and that MyCareer remains a work in progress in terms of uptake and value.

# 13. Sex Equality & Tackling Misogyny (SETM) and Violence Against Women and Girls (VAWG)

## Overview

13.1 This section provides a very brief overview of the findings of the deep dive into Sexism, Misogyny and VAWG within Police Scotland. Although within the service these are seen as separate workstreams, our reflections and recommendations treat the two as interconnected issues, in line with national and international policies and strategies.

13.2 We found that although there is clear commitment to improvement in this area, which is complemented by sound strategies and action plans, additional action is needed to challenge and eradicate deeply embedded outdated attitudes that contribute to a hostile environment towards women within the service, and likely affect policing in wider society. Detailed findings of our research and recommendations will be included in the full Sex Equality & Tackling Misogyny (SETM) and Violence Against Women and Girls (VAWG) report, which will be submitted to Police Scotland at a later date.

## Evidence and Assessment

13.3 The findings of the deep dive into Sexism, Misogyny and VAWG were, in many ways, unsurprising. To arrive at our findings, we undertook interviews with women who serve as Police Officers at different ranks, divisions and departments as well as female civilian staff members. We examined the SETM Action Plan and the VAWG strategy, as well as internal surveys around women’s experiences in the workplace. Lastly, we had a number of meetings with the ACC and DCC responsible for delivering on those strategies and held discussions with the Scottish Women’s Development Forum (SWDF) and the Professional Standards Department (PSD).

13.4 Our interviews with women and with the SWDF brought to life the many ways in which both institutional and personal sexism and misogyny is a daily experience for many. These findings were already known to Police Scotland.

13.5 At the same time, we were impressed by the depth and breadth of the internal SETM action plan, as well as the externally facing VAWG strategy. Both were created following extensive consultations with stakeholders both within Police Scotland and within Scotland’s diverse communities, organisations and services. This is commendable as it demonstrates Police Scotland’s commitment to the co-production and delivery of those strategies and action plans. The service’s work on Violence against Women and Girls is an example of good practice in this respect.

13.6 We also found that sexist and misogynist attitudes are still pervasive within Police Scotland and expressed in more overt or covert ways at different times and in different contexts. We further concluded that sexism, misogyny and VAWG are treated as two separate workstreams; although this may be the case for how they are addressed by the service, they need to be understood as interrelated causes and consequences of each other – essentially as two sides of the same coin.

13.7 We believe that the current strategies and action plans in place to combat sexism, misogyny and VAWG provide a great starting platform for the issues to start being addressed. For this to be fully effective, these issues need to be understood in depth, and all employees of Police Scotland need to feel empowered to challenge sexist and misogynist attitudes and behaviours, with the help of a robust support system at the highest levels.

## Ability to achieve progress

13.8 There is clear commitment, energy and appetite to eradicate sexism and misogyny within Police Scotland to enable it to achieve its EDI objectives and to deliver effective policing to women and girls in Scotland. Aligned with the rest of this report, we believe that in addition to the commitment at the highest level, work needs to take place across the entirety of the organisation to challenge the status quo and the attitudes and behaviours that perpetuate it, and those who behave in sexist/misogynist ways or who commit acts of VAWG receive a robust and effective response.

13.9 We believe that the recommendations in our supplementary report provide practical, tangible steps that can assist Police Scotland in moving in the right direction in this area and trust that the commitment we have seen during the course of our research will provide the momentum and context necessary for Police Scotland to continue to move forward.

# 14. What next? Policing Together 2024 – 2026

14.1 This section outlines a series of specific steps which we believe will support Police Scotland in continuing to progress the implementation and delivery of the Policing Together strategy over the next two years. As we have stated previously, we are not presenting these as recommendations. Rather they are practical steps which we think should be taken in the next 1 to 2 years, that would enable Police Scotland to realise its commitment to EDI&HR and anti-discrimination and that the IRG would be well placed to support.

14.2 A more robust approach to mainstreaming EDI&HR across all of Police Scotland’s business is essential in this regard. We do not believe this requires the development of new policies and processes but rather the embedding of EDI and HR in the development and implementation of those already in place. We would strongly guard against devising new initiatives or bolt-ons to existing policies. As stated earlier this means the incorporation of a focus on equality, non-discrimination and diversity into **all** strategies and policies that inform the delivery of the service.

14.3 We have commented above on the necessity of ensuring the core team overseeing the development and delivery of Policing Together have the necessary capacity and capability to support and enable implementation across the service. Given the significant environmental shifts that have taken place, this mid-point stage of Policing Together is also an important opportunity to reflect and revise on the overall aim and objectives of Policing Together and how to ensure it is owned by the whole leadership team.

14.4 In considering the role and membership of the IRG going forward our focus is on how it can best support the senior leadership of Police Scotland, building confidence and trust internally and externally, while maintaining an independent assurance role. This will be especially important in light of the recommendations that will come from the Public Inquiry into the death of Sheku Bayoh. This will also require further discussion with the SPA Oversight Group to ensure clarity of roles and responsibilities. The SPA will in turn need to ensure the Oversight Group has the relevant EDI and HR expertise and understanding and experience of anti-discrimination and anti-racism to be able to scrutinise progress. We say more about the future of the IRG in Section 15 below.

## Governance

14.5 It is essential that, as Police Scotland builds on progress to date to ensure effective oversight and management of the delivery and development of Policing Together at this halfway point, to achieve this we suggest:

* Building the capacity and capability of the core Policing Together team to enable and support local and functional delivery. This would include project and programme management skills, monitoring and evaluation and EDI and HR expertise.
* Bring key internal stakeholders together, including members of the senior executive and representation from Staff Diversity Associations, to agree a clear logic model / Theory of Change, a prioritised implementation plan and a shared narrative. The work done already to bring representation from the Diversity Associations into one group is a helpful step forward.
* Set out a streamlined, prioritised, programme that drives national and local priorities in a coherent way and is able to scale up on innovation.
* Review the role and membership of the Strategic Oversight Board (including its size and seniority) to ensure it is driving the programme and focused on operationalising the strategy and that it is working effectively alongside the PTTG.
* Set out a clear plan and rationale for engagement with Diversity Staff Associations vs community engagement in supporting the delivery of Policing Together.
* It is not apparent that Police Scotland has a clear understanding of how their Diversity Staff Associations can best support the service in its efforts and this feels like an important point for reflection and action, to ensure they are best able to support the delivery of the Policing Together agenda.

## Evaluation and data

14.6 Robust and rigorous evaluation of the implementation of the Policing Together strategy and indeed the various strategies sitting under its oversight, will require both independent expertise and internal capacity and capability. Effective collection and utilisation of data are crucial to underpinning the measurement of progress. We have not yet seen a clear picture of what data is currently being collected or why. We would suggest the following:

* Pull together a clear picture of what data Police Scotland are currently collecting, including by protected characteristic, and why. Much of this may be due to historical priorities.
* Building on this, ensure a clear plan is in place for impact measurement and disaggregated to demonstrate the 'so what' for all Police Scotland strategies and actions. Use this data to support reporting to the SPA Oversight Group.
* Ensure the service is clear as to the aim of publication of ‘The Standard’ and publication of misconduct cases and ensure there are clear measures in place to demonstrate you are achieving this aim (e.g., increase in confidence in the complaints system). Evaluate recent training modules on manager, officer, and staff confidence in the complaints system.
* Prioritise the organisation’s capability to record and analyse complaints and grievances by protected characteristic and then establish transparent plans with impact measures to deal with any issues that arise.
* Be clear on the aim and objectives of EDI and anti-discrimination training in YLM and PMDP and ensure effective monitoring and evaluation (e.g., changes in attitudes and behaviours as a result of the training).
* Put in place monitoring and evaluation, disaggregated by protected characteristics, for all vetting, misconduct and complaints cases and provide quarterly reports to the SOB.

## Equality and Human Rights Impact Assessment

14.7 As stated above, the current approach to EqHRIA feels overly focussed on process and not outcome. Effective use of EqHRIA can significantly benefit mainstreaming and enhance the effective operationalisation of the overall Policing Together strategy.

* Undertake an independent review of progress and barriers in relation to the process / approach, ownership and implementation of current approach to EqHRIA, supported by the IRG.
* Ensure those responsible for leading EqHRIA practice are able to report on what difference their approach has made.
* Policing Together should set a clear outcome measure on EqHRIAs with a specific focus on outcomes/impact.
* Ownership for EqHRIAs should be escalated to senior leaders.
* EqHRIA the new Support Handbook for First Line Managers to ensure that all protected characteristics are addressed (e.g., equity and inclusion in religion and belief) with links to guidance that will assist them to address discrimination and harassment within the workplace.

## Systems and processes

14.8 Successful delivery of the Policing Together strategy requires an increased effort in embedding EDI & HR in organisational systems and processes. These include:

*Complaints and grievances*

* Measurable improvements in building line manager confidence in informal and mediation skills and techniques
* Monitor and evaluate the impact of line managers’ use of the new Support Handbook and KIT Days to tackle aspects of EDI among serving officers and staff.

*Promotion*

* Review and update the MyCareer appraisal system to embed specific questions on EDI, values and behaviours and reflect on different usage of reflection logs by gender (men more likely to promote their activity than women).
* Ensure fairness and transparency in the promotion system (e.g., EqHRIA of the promotion criteria and make up of panels). Undertake more detailed analysis of who is applying and getting promoted, who is not and why by protected characteristic.

*Vetting*

* Introduce enhanced vetting processes for those who might hold sexist/misogynist attitudes and for potential perpetrators of VAWG. These assessments should be applied both to prospective trainees within Police Scotland, as well as existing employees, regardless of rank or length of service.
* Consider the introduction of a values-based approach to vetting and recruitment.

*Exit*

* Have a clear plan in place for recording exit interviews that include key EDI considerations such as discrimination that can be gathered and analysed by protected characteristics.

## Learning, Training and Development

14.9 LTD has been a central focus for the IRG, with most members sitting through probationer training and participating in a day-long session to understand the full scope of Police Scotland’s activities. We have provided a more detailed and we hope practical contribution to the team leading on the development and delivery of the forthcoming LTD strategy, summarised in the key points below:

* Senior leaders and managers who shape the vision and values of Police Scotland should be offered training to acquire a more robust level of EDI and anti-discrimination knowledge.
* The forthcoming LTD strategy should develop a pyramid model for offering EDI and anti-discrimination training. The building blocks approach within the EDI e-learning module has begun that process.
* Review the most effective methods for teaching EDI and anti-discrimination. We have heard concerns about Moodle and enthusiasm for more face-to-face, which is seen as more valued.
* Using the short life working group, which has been established, ensure that EDI and HR - and explicit anti-discrimination training be mainstreamed across all areas of LTD. EDI and HR and anti-discrimination have relevance to all areas of police activity.
* Ensure clear plans are in place to analyse data and measure the impact of all EDI and anti-discrimination training, beyond simply numbers attending or satisfaction with materials.
* Given the relevance of this agenda to their functions, ensure PSD and Vetting staff all have an appropriate level of EDI and anti-discrimination training commensurate with the requirements of their roles.

## 15. Next steps for the IRG

15.1 The Policing Together strategy includes a commitment to a standing Independent Review Group. Having concluded our review, we have taken the opportunity to consider lessons learnt during the last three years, including some of the challenges we have faced in delivering on the brief we were set at the outset.

15.2 We have drawn on our experience to offer some insights to Police Scotland about the future of the group. Core to these is the need for the sponsorship of the group to be owned by the relevant DCC with consistent engagement and space for ongoing reflection and review.

15.3 As the group transitions to a new model and reconstituted membership (which may include the continued involvement of existing IRG members) sufficient thought must be given to the function and form of the group, and the deliverables and timescales expected. Continued secretariat support is critical.

15.4 With regard to the future function of the group, we suggest that consideration should be given to the Professional Reference Group model, with an Independent Reference Group that is positioned to be a critical friend, bringing an external EDI and HR lens supporting the most senior level of leadership of Police Scotland (CC and DCCs) embedding EDI considerations across all areas of development and delivery from the outset. The IRG would be well placed to:

* Support PS in taking forward the actions suggested above
* Respond to ad-hoc issues and priorities such as hate crime reporting
* Work alongside the Chief Constable and Deputy Chief Constables in reviewing the development and delivery of policies, strategies and service delivery in order to understand and mitigate risks and issues that might arise.

15.5 With regard to form, it is vital that the membership of the group comprises understanding and experience of both EDI & HR, and organisational and institutional change and development, with an ability to bring in specific expertise as required. Crucially this must be in tandem with lived experience; intersectional understanding is especially important.

## Appendix 1

## Including lived experiences to inform EDI and anti-discrimination training

Evidence-informed practice can contribute to better, appropriate and responsive decision making, resource allocation and services. In relation to the provision of equality, diversity, inclusion and anti-discrimination training, this would involve including the voices of those who experience exclusion, discrimination and inequalities. The inclusion of lived experiences and voices of those marginalised is a key of part good practice in the design and delivery of EDI training.

Ideally, those with lived experiences should be included in the co-production and delivery of EDI and anti-discrimination training. Those with lived experiences can provide a powerful and authentic voice as well as unique insights that assist in challenging assumptions and are often effective in motivating individuals and organisations to do things differently and identify areas for change.

More importantly, the inclusion of those with lived experiences goes some way to addressing historical power imbalances where the voices of those discriminated against were unrecognised, unrepresented and unheard.

It is important to ensure that the inclusion of those with lived experiences needs to be undertaken in a way that is not tokenistic or exploitative, for example, expecting those with lived experiences to provide the solutions or that the experiences of one person with lived experience is used to represent all people from those backgrounds. It is therefore important to include varied lived experiences and not assume one lived experience is representative of all lived experiences. The inclusion of contributions from those with lived experiences should be as co-contributors rather than just being another item on the agenda. The inclusion of lived experiences is most effective if the individuals with lived experiences also have a conceptual understanding of how discrimination and inequities work in contemporary Scotland. This would enable a more robust shaping of the content of training as well as the development of social justice literacy for the participants.

However, those who plan and shape EDI and anti-discriminatory training need to be mindful that there are those who have lived experiences and are part of minority groups who have internalised domination or subordination. By this we mean those who have internalised the status quo which can lead them to deny they have faced discrimination and challenge. Sadly, such voices can undermine or resent those who are open about having experienced discrimination. For example, someone from a black and ethnic minority group who claims they have never experienced racism and in so doing blocks change as they enable organisations to deny or be complacent about institutionalising equity. While there will be individuals who have been fortunate enough not to have experienced discrimination, invalidation or marginalisation, these experiences are not the norm. For example, in the area of ‘race’, a third of black and Asian groups in Scotland consistently experience racial discrimination and a slightly higher number consider racial discrimination to be widespread (Meer, 2022).[[1]](#footnote-0)

It is hard to attribute precisely the influence of involving people with lived experience. Nevertheless, people respond well to the accounts and counsel of those who have experienced discrimination and marginalisation. These life accounts humanise the issues and reminds us why it is important to continue to challenge stereotypes and to work for a fairer society. The positive benefits for involving people with lived experiences are both valuable for the participants undergoing the training but also for those coming in to share their experience.

## Appendix 2

## Having conceptual and functional clarity in delivering for social justice

Taking forward EDI work in Scotland requires an inclusive approach which ensures all protected characteristics named under the Equality Act 2010 as well as issues of geography and social class are addressed. Effective EDI work also requires a grasp of why particular systemic discriminations occur, for example, understanding how power has been wielded over time to determine the ‘natural order of things’ e.g. the impact of colonialism and imperialism, patriarchy, heteronormativity and so on.

Developing an understanding of the interlocking nature of different forms of oppression and discrimination as well as the connections between these needs is a key aspect of EDI training. However, any EDI strategy as well as training, particularly of senior leaders and managers within an organisation needs to be accompanied with a forensic understanding of the specifics of each form of discrimination. Acquiring that dual lens will lead to more effective and sustainable delivery of EDI.

A generic EDI approach while functionally expedient does not potentially encourage us to understand how oppression and inequalities have become normalised. Conceptual clarity is important if we are to avoid functional ambiguity. For example, if we do not understand how systemic, structural and institutional racism operates, we may identify a list of actions which addresses surface issues such as having a cultural calendar packed with events but do little to dismantle processes that place some cultures above others or to question such assumptions.

Bold approaches will ensure difficult issues are not avoided or sanitised. For example, avoiding talking about anti-racism preferring instead the language of inclusion or diversity, avoiding naming homophobic bullying preferring instead to talk about generic anti-bullying approaches.

Within a Scottish context, there are issues that may be easier to avoid such as the need to challenge racism and embed anti-racism. The lower population of racialised and minoritised people means that there is a lack of critical mass to have voice, and this coupled with a national belief that we are welcoming, tolerant and all “Jock Tamsin’s bairns” often leads to a denial of the need to name racism and anti-racism specifically. These same reasons could be used to avoid and marginalise other issues perceived as minority such as transphobia, Islamophobia, anti-Semitism and so on. It is often assumed that a generic EDI approach covers all characteristics equally. This is a naive approach as the tendency will be to prioritise issues that are perceived to impact on larger numbers or issues that are easiest or least uncomfortable to address. Naming issues is the first step to putting in place steps to get things right.

To enable the Equality Act 2010 public sector equality duty (PSED) to be fully met, employees need to be given opportunities to recognise how discrimination is occurring, to understand how microaggressions and invalidations occur every day that prevent equality of opportunity for people who share a protected characteristic. Engaging with EDI or the PSED is not simply about meeting legal requirements or learning to like or respect people who are different to you or about ‘doing something for minorities’ but to understand why this is needed, that is to dismantle historical injustices and to redefine the ‘natural order of things’.

Key areas that a mature and effective EDI approach should adopt would be to engage with the following:

* Understand the impact of history on present forms of inequalities e.g. colonialism, imperialism and their impact on racism in the 21st century.
* Understanding how inequalities are reproduced through the operations of power in different spaces (personal, cultural, structural and institutional).
* Understanding the impact of privilege (including the need for each person to consider their positionality - that the lenses that shape their understanding of the world).
* Understanding how those in less privileged positions can internalise the status quo and subordinate status and what needs done to redress this.
* Harnessing the experiences of those with lived experience to co-design/inform EDI strategies (please read alongside IRG paper on lived experience).
* Providing examples of practice and action that employees at different levels can utilise to transform practice.

**Developing racial literacy**

Given the bold and sector-leading commitment by Police Scotland to address issues of institutional racism and to be anti-racist, it is important for Police Scotland to develop racial literacy at all levels.

We draw from the work of sociologist France Winddance Twine who first coined the phrase racial literacy in 2004. We describe racial literacy as:

* Having recognition that racism is a contemporary rather than historical issue.
* Understanding that racial identity is a social construct.
* Identifying how race intersects with other characteristics e.g. class, gender, disability, religion and belief, sexuality, sexual identity to impact on life chances.
* Having understanding of the impact of Whiteness.
* Developing the language to discuss race, racism and anti-racism.
* Developing knowledge and understanding of how racism works in the everyday (microaggressions, microinvalidations).

We advise that Police Scotland work on anti-racism, the development of anti-racist modules and anti-racism training should enable growth in racial literacy as described above.

### Appendix 3

### To develop a step change in using LTD to deliver for Policing Together, we suggest the following:

1. Wherever the LTD Strategy cites ’EDI’ that the phrase ‘anti-discrimination’ should be added. This would ensure that learning, teaching and training not only addresses EDI but also assists officers and staff to develop the ability to identify or deal with discrimination at different levels (e.g. personal, cultural and institutional). We suggest reading Appendix 2 titled ‘Having conceptual and functional clarity in delivering for social justice’ in this report and to incorporate the key tenets as appropriate into the LTD strategy and any future design of EDI and anti-discrimination training.
2. The forthcoming LTD strategy develops a pyramid model for offering EDI and anti-discrimination training. The building blocks approach within the EDI e-learning module has begun that process. The pyramid model should identify foundation knowledge that each officer and staff member regardless of rank or function should possess in order to be an anti-discriminatory and inclusive in practice. The model should then outline the types and levels of knowledge that will be required for those at different levels (e.g., first line and middle managers, senior managers, tutor constables, those who commission EDI training and consultancies, those who are in people development and so on). For example, not everyone requires to be an expert in equalities legislation, but some will need to have that knowledge.
3. It is our view that conceptual clarity will assist in developing functional clarity. Therefore, we recommend that senior leaders and managers who shape the vision and values of Police Scotland be offered training to acquire a far more robust level of EDI and anti-discrimination knowledge. Acquisition of depth knowledge and understanding of EDI by senior leaders will provide Police Scotland with the best opportunities to the identification of skills that are required of officers and staff for delivering an equitable and inclusive service.
4. The LTD strategy names the strategic importance of EDI and anti-discrimination as part of the Chief Constable’s introductory statement and at the start of the strategy. At present, EDI is mentioned for the first time mid-way into the strategy.
5. A key area that requires attention is the ability to mainstream EDI and anti-discrimination issues into all aspects of LTD within Police Scotland. Given budget constraints, workload issues and competing priorities (all making for a financial and cultural environment that will be challenging) it is therefore even more urgent that a key focus has to be on ensuring all training courses mainstream and embed EDI and anti-discrimination into all existing training. Trainers and course developers will require support to achieve this. A review of how monies for EDI training are currently being spent should be conducted with the intention to repurpose funds available. Monies should be used initially to review key courses to ensure EDI and anti-discrimination are mainstreamed.
6. To support quality mainstreaming of EDI within LTD, it is important for LTD to have at least two personnel with knowledge depth and understanding of EDI and anti-discrimination issues. Such personnel can be drawn from current personnel but provided with additional depth education and training in this subject area. These personnel would then be able to advise on mainstreaming EDI into existing courses as well as having knowledge to ensure when commissioning different suppliers that these suppliers are able to deliver on EDI and anti-discrimination to take forward Policing Together.
7. Related to the point above, in our scrutiny of documentation made available to us, we conclude that EDI and particularly anti-discrimination in PMDP and YLM still needs to be robustly mainstreamed. We are encouraged to learn that the inclusion part of PMDP will reach around 5000 first and second line managers (from March 2024). While there is a process at present that enables managers and leaders to share how they are putting EDI into practice, and these have been found to be inspirational and rewarding, we suggest a review of how anti-discrimination elements and engaging learners to understand how everyday discrimination occurs at a personal, cultural and institutional level is key as part of building leadership and management capacity.
8. The contributions of managers and leaders would be far more valuable if located within training content that places EDI and anti-discrimination front and centre and within core content. We believe the mainstreaming of EDI and anti-discrimination would also enhance the value of the bespoke facilitated 3 hours session and the newly introduced Empower Hour (90-minutes) on Institutional Discrimination which are offered in addition to the current content of PMDP and YLM. To understand why we stress the importance of anti-discrimination and not just EDI, please refer to Appendix 2 titled ‘Having conceptual and functional clarity in delivering for social justice’.
9. Given the importance placed by Police Scotland on utilising technology for learning and our understanding of different satisfaction levels of engaging with EDI and anti-discrimination as online learning that Police Scotland explores the most effective ways to deliver for EDI and anti-discrimination via an online platform which offers participants the ability to engage in learning in real time (with other participants) alongside the current static EDI Moodle module.
10. We suggest the use of EDI and anti-discrimination learning logs which can then be used as an important resource that each officer or member of staff can draw on as part of identifying future CPD needs or as evidence towards promotion (e.g., via MyCareer). Such learning logs would support the aspiration of the Police Scotland LTD Strategy to nurture reflective practice.
11. We suggest as a matter of priority that a central database of what is on offer locally and centrally on EDI and anti-discrimination is established. This will enable the maximising of resources (personnel and products). This would also begin to address some current concerns about working in silos, not having mobility of resources, a lack of sharing of resources and a need to increase capability and capacity. The database would also identify gaps (e.g., are there particular inequality and discrimination issues which are receiving less attention) as well as strengths (e.g., what has worked well and could be replicated and shared across the organisation).
12. We recommend the identification of learning spaces which are mixed in relation to EDI (e.g., officers and police staff and across roles and ranks). In our work, we found many excellent points around EDI and anti-discrimination arose from discussions with response officers and frontline office staff. Mixed learning spaces will foster the sharing of ideas, practices but also highlight areas of commonalities. These are important spaces which are hidden investments towards creating the ethos of one workforce.
13. In the course of our work, we heard from probationers and also response officers that what was learnt in Tulliallan became lost within the first three years of graduation, particularly if officers were deployed in work areas where EDI and anti-discrimination practices were not valued or celebrated by senior staff and where a ‘canteen culture’ of discrimination and prejudice prevailed.
14. We support the current developments in enhancing the knowledge and understanding of Tutor Constables and would advocate the area of EDI and anti-discrimination is addressed specifically. This would ensure that EDI and anti-discrimination learning undertaken in Tulliallan does not become marginalised, ignored or dismissed.
15. We have observed a tendency towards ‘buying in’ EDI training programmes from other parts of the UK, rather than developing programmes that specifically meet the cultural and operational needs of Police Scotland. While we understand it is easier to ‘buy in’, we believe the potential to change ‘hearts and minds’ of all police officers serving communities across Scotland where many forms of discrimination, tensions, cultural barriers or sensitivities continue to exist is best served by procuring EDI training from those with everyday experience of how discrimination on various grounds manifest in Scotland.
16. It is important to be consistent in the harnessing and inclusion of the expertise and lived experiences of Police Scotland’s diverse staff associations as part of developments in LTD content as this would give place and voice to the associations and to the Truth to Power sessions. The Service already possesses excellent real life examples of how exclusion and everyday forms of discrimination take place which could be used as case-studies or prompts for problem-based learning for managers and leaders. For example, we commend the quotes from the report by Dr A Malik in Appendix 1 of the Thematic Inspection of Police Scotland Training and Development - Phase 2 report; the quotes from Truth to Power sessions; and the quotes from surveys conducted by diversity staff associations (e.g. DACA Membership Survey - Work and Career). The reference to drawing from lived experiences in the new LTD strategy is well made. We recommend reading Appendix 1 in this report ‘Including lived experiences to inform EDI and anti-discrimination training’.
17. Clearer plans for analysing data and measuring impact of all EDI and anti-discrimination training (not just on numbers participating in training) will be required to meet Police Scotland’s strategic aims for EDI as highlighted in recommendation 1 of the HMIC Phase 2 Report on LTD (dated October 2021) that Police Scotland should develop timely, meaningful equality, diversity and inclusion data and the capability to analyse the data to identify and understand trends.

1. Meer,N (2022) Scotland must address institutional racism openly and urgently [https://www.race.ed.ac.uk/scotland-must-address-institutional-racism-openly-and-urgently/](about:blank) [ Accessed 11th November 2023] [↑](#footnote-ref-0)