

Local employment targets for under-represented groups

Setting employment targets in local policing plans

Interim guidance from the
Association of Police Authorities

About this document

This document provides interim guidance to police authorities on setting local employment targets for under-represented groups in local policing plans.

It will be useful to:

- police authority chairs and chief executives;
- APA People Policy Network members;
- APA Co-ordination & Assurance Group members;
- APA BME Network members; and
- Equality & Diversity Officer Network members.

This document will be updated and supplemented later in 2009, with case studies demonstrating police authority good practice.

APA contact

Tom Tyler

Equality and Diversity Strategic Advisor

020 7664 3169

tom.tyler@lga.gov.uk

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Introduction

1 Since 1999 the police service has been aspiring to meet a ten-year 7 percent black and minority ethnic (BME) police officer and staff strength target, as introduced following the Stephen Lawrence Inquiry. Although the service has doubled its BME police officer representation to 4.1 percent in those ten years, it has become clear that local targets reflecting local circumstances and community needs would be more beneficial.

2 The recent Government policing green paper proposed that local employment targets relating to race and gender should be agreed locally by police authorities and forces in consultation with communities. This proposal was confirmed in the Government's review of the green paper consultation, stating that *'...ambitious targets should be set on the most important issues locally. The police authority will set the targets, which should be agreed with the force, and the target setting process must involve police officers, police staff and local communities'*.¹

3 Following an APA Equalities Seminar held in January 2009, it has become clear that guidance on setting local employment targets would be welcomed by authorities. However, following the Home Office formal response to the Green Paper consultation announcement in Autumn 2008, the APA recognises that there has been limited time for authorities to prepare and consult on proposed employment targets for under-represented groups. Authorities are likely to be in the final stages of agreeing their policing plans for 2009/10, and the APA has recognised that it is imperative that initial guidance is circulated as soon as possible. We recognise that authorities may already have appropriate targets in place for this year's policing plans, but would encourage authorities to consider the issues broached within this document as part of the ongoing process of reviewing targets and priorities during 2009.

4 Authorities should note that the APA is planning to publish substantial guidance in time for next

year's policing plan preparation cycle. This guide will build on the key areas highlighted within this document, and share the best practice and experience of authorities in preparing targets for the 2009/10 policing plans.

Local mapping and agreements

5 The real benefit of setting local targets is that they can be set on the basis of the local police service aspiring to reflect the demographics of the local population. To this end, it is essential that in the first instance police authorities conduct a community mapping exercise considering relevant demographic information. Up-to-date data from key local partners such as the local police force, local authorities and primary care trusts should be utilised because it is recognised that the 2001 census data is essentially redundant. Similarly, the Office of National Statistics (ONS) will be a useful resource for authorities – its website can be found at www.statistics.gov.uk/default.asp

RECOMMENDATION 1 Understand your population – conduct a community mapping exercise

RECOMMENDATION 2 Do not rely on out-of-date census statistics, but instead engage key partners and other sources in order to obtain relevant demographic data

6 It is essential that analysis is also conducted on the current police workforce, utilising all relevant force employment data. A clear understanding of the current position in terms of recruitment, retention and progression within your local police force is imperative. Data sets should be disaggregated for gender and race as a minimum, but also other diversity strands, if this information is collected locally and it is considered appropriate. If data is plotted on a graph, trends can be identified and it might become clear that there is a significant issue with retention of a certain demographic at a certain stage of their

¹ *From the neighbourhood to the national: policing our communities together – summary of Green Paper consultation responses and the next steps*, p20, para 4.8, Home Office, 2008

career, for example ethnic minorities during probation periods, or women after 10 to 15 years of service.

7 All relevant employment data should be considered, for example, data in relation to sickness rates or officers put on restricted duties, which may well indicate an issue which could be a factor in relation to retention. Force data should also be able to project retirement rates, therefore informing the police authority in advance when promotion opportunities will become available, meaning that appropriate targets can be set.

RECOMMENDATION 3 **Conduct an assessment of all relevant workforce data and study trends in order to identify any areas of concern which need to be addressed**

Effective consultation

8 The green paper is clear – police officer, police staff and local communities must be involved in local employment target setting.

9 Police workforce representatives must be engaged at the earliest stage in the target setting process. They will know what employment issues exist within the local police force and be able to advise the police authority on appropriate targets to address concerns and gaps. This engagement should include the local employment data assessment process, and the representatives should include:

- trade unions;
- statutory staff associations; and
- diversity staff support groups.

RECOMMENDATION 4 **Engage staff associations and diversity support groups at the earliest opportunity in the process – if there are no appropriate local diversity staff support groups in place, then authorities should make an approach to relevant national representative groups**

10 Due to the timing of the green paper, it is recognised that the normal level of comprehensive public engagement which many authorities would have engaged in will not have been possible for the 2009/10 employment targets. However, a certain level of public consultation can be achieved in a short period of time in order to inform the setting of local employment targets.

11 Independent advisory groups (IAGs) are managed by every police service in England and Wales. Indeed, more and more police authorities are recruiting and managing their own IAGs. The community representatives who sit on force IAGs will normally be well aware of employment issues within their force due to their involvement in monitoring employment data and equality schemes. Therefore, as a minimum, police authorities should be engaging IAGs to assist in analysing local community mapping exercises along side force employment assessments, and then in considering proposals from the police authority on what potential employment targets could be set.

RECOMMENDATION 5 **Involve IAGs in both analysing local mapping and assessment exercises, as well as in developing appropriate local employment targets**

12 Many police authorities will be engaged in formal public consultation on either identifying local policing priorities, or by now, final copies of local policing plans. This may well include one or more of the following methods:

- web surveys;
- public consultation events;
- focused engagement with usually-excluded groups;
- focus groups;
- citizen panels; and
- roadshows.

13 If at all possible, time should be set aside to explain to the community or consultees why

employment targets are a priority for the police authority, what has been done to identify potential targets and to ask opinions on suggested targets. The APA has recently published a good practice document on community engagement which authorities may find helpful. This can be found at www.apa.police.uk/apa/publications/community+engagement+methods

RECOMMENDATION 6 Local communities should be consulted on the proposed targets for 2009/10 local policing plans through existing consultation processes

Setting targets

14 Following analysis of local community mapping and employment assessments exercises, police authorities will want to consider where they would want the force to be in relation to its workforce demographics, not just in a year but also longer-term. To this end stretch/ambitious employment targets should be considered for inclusion within policing plans alongside annual milestone targets, and considered as part of longer-term strategic planning.

RECOMMENDATION 7 Longer-term/stretch targets should be considered for inclusion in policing plans alongside annual milestone targets

15 In terms of what targets should be set, employment (recruitment, retention and progression) targets for police staff (including police community support officers [PCSOs]) should be set alongside targets for police officers. Although some police forces may not be recruiting officers next year (and authorities will be aware of staffing levels and force recruitment plans), this does not mean that employment targets can not be set. Retention and progression are two significant areas of employment concern for under-represented groups, and it should be noted that progression does not necessarily mean promotion, but should also include targets in

relation to increasing representation of under-represented groups on specialist units.

RECOMMENDATION 8 Authorities should set employment targets for police staff (including PCSOs) alongside those for police officers

RECOMMENDATION 9 Consideration should be given to setting targets – not just for recruitment, retention and promotion, but also representation on specialist units

16 When setting employment targets, authorities should include targets for gender and race as a minimum. Local circumstances will dictate the need and priority of certain targets – for example, gender recruitment rates have improved significantly over recent years nationally, although this may not be reflected in all forces. Similarly, authorities should bear in mind all local diversity issues and not just targets for visible ethnic minority communities. For example, in relation to race, consideration should be given to the wider diversity of the local population, for example new and emerging communities or the Gypsy and Traveller community. Similarly, if appropriate monitoring systems are in place within the force to monitor workforce employment data against other strands of diversity, for example sexual orientation, then targets could also be considered in terms of significant local diverse communities, for example the lesbian, gay and bisexual community.

RECOMMENDATION 10 Authorities should set employment targets for gender and race as a minimum – consideration can be given to the need for employment targets against wider local diverse circumstances as appropriate, and if relevant and accurate workforce data is available

17 Local age profiles should also be taken into account when setting targets. Local mapping and workforce assessment exercises should consider not just the local population and the working population, but also the average age range of

recent recruits into the force. This age profile of recruits can then be considered against the age profile of under-represented groups in the local community. This exercise may well indicate a higher proportion of ethnic minorities in the average recruiting age range than in the general population, and this should be reflected in local targets. The Labour Force Survey and other information published by the ONS will assist authorities in this area.

RECOMMENDATION 11 Consideration should be given to the significance of local age profiles in target communities before setting recruitment targets

18 The four police authorities in Wales will also want to recognise their responsibilities under the Welsh Language Act, to ensure that consideration is given to the need to reflect the Welsh language communities served.

19 Authorities will want to note that in order to assist police authorities in setting employment targets the Home Office and National Police Improvement Agency (NPIA) are developing a 'workforce modelling tool' – a spreadsheet which allows authorities to input employment data and then indicates what milestone should be set on an annual basis in order to reach a longer-term target. It is hoped that that this tool will be ready for authorities to utilise in time for 2010/11 target setting.

Communication

20 Effective communication, both internal and external, is essential. Externally, the commitment and drive of the police authority, when it announces its intention to recruit a more diverse workforce, will have an added benefit of both increasing:

- confidence in the policing; and
- awareness of employment opportunities within the police.

21 Conversely, police authorities have a duty to promote equality and diversity within their local police force and, by firstly consulting the workforce and then effectively communicating the commitment of the authority to increasing representation in the workforce by setting appropriate targets, the authority will be positively meeting this duty. An outcome of which would hopefully see the workforce, whether in contact with the public at work or whilst at home, actively promoting employment opportunities within the police.

RECOMMENDATION 12 Authorities will want to develop an appropriate communications strategy, targeting both internal and external communities, to promote the commitment and drive of the authority in ensuring the local police force has a more representative workforce

Monitoring of targets

22 Once targets have been set, it is imperative that authorities effectively and regularly monitor progress. The Race Relations (Amendment) Act 2000 introduced the duty of employment monitoring, so authorities should be well aware and experienced in regularly reviewing force employment data. As recommended in the tripartite guide *The Employment Monitoring Duty – Guidance for the police service in England, Wales and Northern Ireland* (2006), authorities should be considering employment monitoring reports on a quarterly basis. This guide can be found at www.apa.police.uk/apa/publications/employment+monitoring+duty

23 If the local force does not collect relevant employment data against aspects of diversity beyond race and gender, then the police authority may want to consider implementing targets for the force to introduce a new employment data monitoring process which covers aspects of diversity beyond simply gender and race. The employment monitoring guide promotes this

2 Police and Justice Act 2006; Statutory Instrument 2008 No. 82; The Police Authorities (Particular Functions and Transitional Provisions) Order 2008

approach to data gathering as good practice; and is a position supported by diversity staff support groups, for example the Gay Police Association (GPA), which published joint guidance with the Association of Chief Police Officers (ACPO) in 2004 in relation to the collecting and monitoring of sexual orientation employment data.

RECOMMENDATION 13 Authorities should consider setting targets for their force to record and monitor employment data beyond just gender and race

24 Authorities will want to be aware of the positive action initiatives which the force is offering in order to meet local employment targets. Similarly, regular monitoring of the take up of internal positive action opportunities by the workforce should be conducted. It is imperative that the authority is satisfied that the force is effectively communicating these opportunities and that these are lawful initiatives considering the investigation by the Equalities and Human Rights Commission (EHRC) into a number of forces in recent years. Authorities should note that both the NPJA and EHRC are planning to publish guidance and good practice in relation to positive action over coming months.

25 Police authorities will want to be aware that the Ministerial Ethnic Minority Steering Group has endorsed this interim guidance and will be reviewing the local employment targets set in 2009/10 local policing plans. Also, HMIC will be undertaking a workforce inspection in 2010 when it can be expected that progress against targets set and specific action/work in this area will be assessed.

**Association of Police Authorities
15 Greycoat Place
London SW1P 1BN**

**Tel 020 7664 3168
Fax 020 7664 3191**

www.apa.police.uk