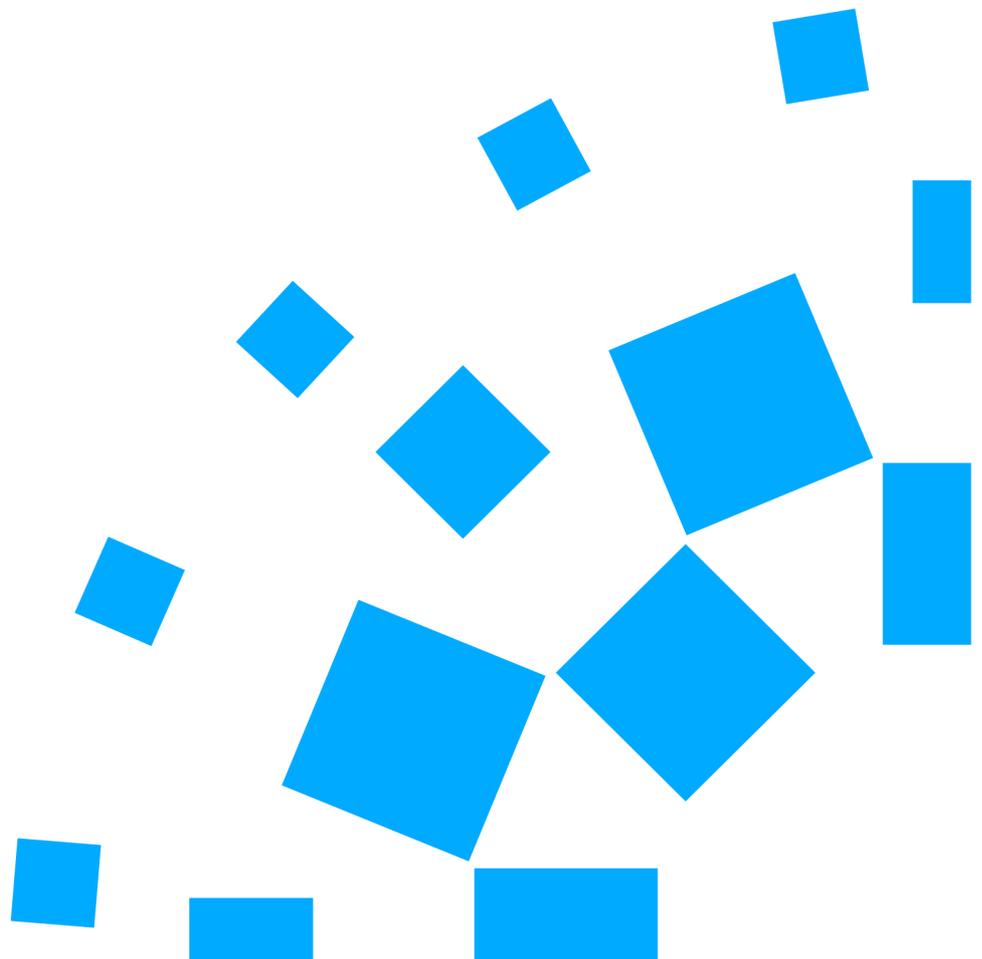# Equality impact analysis

PEQF Police Community Support Office Entry Route

Version number 5.0

College of Policing Limited

Leamington Road

Ryton-on-Dunsmore

Coventry, CV8 3EN

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Table of changes

Version	Modification made	Month/Year
5.0	New and amended paragraphs: 15, 18, 21-22, 45-48, 50, 53, 60, 63, 79, 81, 83-85, 96, 98, 103- 105, 109, 120-121, 123, 126-127	October 2021
4.0	New and amended paragraphs: 5, 7-8, 15, 18, 20-22, 26, 28-38, 62, 116-118	August 2021
For previous versions of the EIA please email **PolicingEQF@college.pnn.police.uk**		

Contents

Introduction

1.   Police community support officers (PCSOs) make an invaluable contribution to the communities they serve and to policing. Providing an essential uniformed presence in our communities, PCSOs focus on understanding and identifying local priorities, solving local problems, tackling low-level crime and engaging with the community. They undertake a key role in helping to foster positive relationships, promoting cohesion and inclusivity, and building trust and legitimacy.

2.   The National Police Chiefs' Council (NPCC) and the Association of Police and Crime Commissioners (APCC) 'Policing Vision 2025'[1] sets out a transformative agenda, which will enable the service to meet the challenges of modern policing and tackle new and emerging threats to community unity and harmony. The Policing Vision places an improved policing service for the public at the heart of its professional agenda. It establishes the link between communities and the police as part of the bedrock of British policing. The 'need to develop a proactive and sophisticated understanding of community needs, to keep people safe, particularly as communities become more diverse and complex' is identified as a key challenge.

3.   The Police Services Statement of Mission and Values 2025[2] highlights the significance of the PCSO in their helping:

> …to make communities safer by upholding the law fairly and firmly; preventing crime and anti-social behaviour; keeping the peace; protecting and reassuring communities...

As it is a community-based role, the PCSO constitutes a fundamental component of the national strategy for local policing across the UK. PCSOs are highly valued public-facing members of the service. As part of the transformative agenda set out in the Policing Vision, the role of the PCSO,

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[1] NPCC/APCC. (2016). 'Policing vision 2025' [internet]. Available from npcc.police.uk/documents/Policing%20Vision.pdf [Accessed January 2019]
[2] Ibid

and ensuring they have the right skills and abilities to continue to be effective, has been re-examined and updated.

4.   At the request of the Policing Trailblazer Apprenticeship Employer Group (which represents police forces developing and delivering policing-related apprenticeships), we worked with key policing stakeholders to develop new entry routes for the PCSO role.

5.   A key component of the Policing Vision is that the police service is representative of the communities it serves. It is essential that we try to understand whether initiatives, such as the new PCSO entry routes, have an impact on workforce demographic. That is the purpose of this equality impact analysis (EIA).

6.   The police service is working with diligence and passion to promote diversity, equality and inclusion. Forces are engaging with the community and forging connections with groups who had not previously considered policing as a career. We are proud to support forces in their work to secure a fair, inclusive and representative police service. This EIA aims to ensure consideration is given to how the new PCSO entry routes reflect the diverse communities that policing serves.

7.   The impact that the new PCSO entry routes have on the demographic diversity of the police workforce will depend on a number of variables. Forces will play a significant part in the successful introduction of the routes and their outcomes, such as recruitment, retention and attrition, as well as supporting those who wish to become a police officer. It is essential that each implementing force considers how it will identify, monitor and address any possible disadvantage against a protected group or other inequality issues.

8.   The EIA is limited by a lack of data and other research on the PCSO workforce. For a force to understand whether the routes are having any impact on the protected groups, they should monitor protected characteristic data for their existing workforce and new recruits before and throughout implementation. Analysis of this data will direct the force to any disproportionality or under-representation. Findings should be included in the

force's EIA. We will continue to ask forces to share data[3] with us so that we can develop a national analysis.

Programme information

9.   The PCSO role is a community-based, public-facing role. It requires application of a wide variety of professional knowledge, understanding and skills, across a range of complex and challenging situations and contexts. The role also asks for a demonstration of appropriate behaviours congruent with effective and appropriate front-line policing.

10.   We worked in partnership with police forces and other stakeholders to develop the new PCSO entry routes. As part of this work, the existing and emerging aspects of the role and the likely future pressures on community policing were carefully reviewed and considered by all parties. The review also assessed the skills, knowledge and behaviours required to meet these challenges. The routes are designed to: 'ensure that the PCSO receives a modern and up-to-date professional education, covering the knowledge, skills and professional approaches identified as critical to 21st century local policing'.[4]

11.   There are two new PCSO entry routes:

   ▪ Level 4 PCSO apprenticeship entry programme
   ▪ Level 4 PCSO non-apprenticeship entry programme

These entry routes are accredited by successful completion of a level 4 qualification in Community Policing Practice.

This qualification is awarded by either:

   ▪ an Ofqual/Qualification Wales regulated Awarding Organisation (titled Level 4 Diploma in Community Policing Practice) or,

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[3] This data will be anonymised and in full compliance with data protection legislation.
[4] College of Policing (2018). 'Policing Education Qualifications Framework Initial Entry Routes into Policing: Police Community Support Officer (PCSO), Strategic Overview'

- a Higher Education Provider (titled Level 4 HE Certificate in Community Policing Practice).

In either case, the professional curriculum covered and the level of professional education and competence achieved by the officer is identical.

12. An enhanced connection between professional learning and professional practice is one of the key features of the new level 4 PCSO Apprenticeship. This link is crucial, so that there is clear understanding on the part of the officer of not only what to do and when, but why they are taking a particular course of action. They will be trained to calibrate their decision-making process and professional actions in the light of potential alternative methods of dealing with any particular situation.

13. The PCSO curriculum has the following structure:

    1. **Phase one operational learning**: role based general learning in specific policing areas.

    2. **On-programme tutoring (first period)**: the first phase of tutorship – initial learning supplemented by professional duties.

    3. **Phase two operational learning**: learning in areas key to successful working with the community.

    4. **On-programme tutoring (second period)**: more advanced community based learning with targeted professional duties.

    5. **Independent patrol status**: the officer has demonstrated sufficient competence to function independently, safely and lawfully.

    6. **Phase 3 operational deployment**: the officer is now of sufficient competence to take more of a lead role in operational incidents. Evidence of competence is kept via an Occupational Competence Portfolio.

14.   All officers on the PCSO Apprenticeship will complete an end-point assessment before finishing the programme. Completion enables the employer force to confirm the recruit in post as having successfully completed probation.[5]

Implementation

15.   As of September 2021, the number of forces who have implemented the new PCSO level 4 entry programmes is as follows:

PCSO Apprenticeship entry programme	PCSO Non-Apprenticeship entry programme
3	4

Legislation

16.   Further to section 149 of the Equality Act 2010 (the EqA), the public sector equality duty (PSED) requires public bodies who carry out public functions to have due regard to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act

- advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it

- foster good relations between people who share a relevant protected characteristic and people who do not share it

The PSED applies to all nine protected characteristics listed in the Equality Act 2010:

- age

- disability

- gender reassignment

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[5] Subject to the probationer having fully met the local force's probation requirements.

- marriage and civil partnership

- pregnancy and maternity

- race

- religion or belief

- sex

- sexual orientation

17.   Socioeconomic status is also a factor that can be a basis for inequality. The duty is not yet in force in England but has been enacted in Scotland (April 2018) and Wales (March 2021). Through data collection and analysis, forces will be able to ensure that the impact on this characteristic is also taken into account.

18.   We are committed to ensuring that the Welsh and English languages are treated equally where applicable, in accordance with the Welsh Language (Wales) Measure 2011. We have developed a **Welsh Language Scheme** to support Welsh forces in complying with their statutory duty to provide bilingual services to the public in Wales. The scheme has now been implemented.

19.   PCSOs may be appointed by a chief officer of police from the authority given under section 38 of the Police Reform Act 2002. The new entry routes have been drafted with due regard to all prevailing legislation.

Updating the EIA

20.   Diversity, equality and inclusion considerations are an integral part of the decision-making infrastructure of the Policing Education Qualifications Framework (PEQF). These considerations influence all aspects of programme development and implementation. This regard is an ongoing and continuous process. Collation of our analysis and relevant updates will be included in revisions to this document, scheduled for publication twice a year or upon each key project update. This document will remain a living document. We will include key findings from stakeholder meetings, recommendations, action plans and emerging practice to reflect progress made, as well as any new challenges identified. The EIA will remain a living document. To support future

updates of the EIA, **we welcome** data or further evidence from forces and other key stakeholders.

Data

21.   Home Office national police workforce data does not currently cover all nine protected characteristics. Only demographic indicators for age, disability, ethnicity and sex are currently available. We are a key stakeholder in delivering the **NPCC Diversity, Equality & Inclusion Strategy 2018-2025**.[6] To achieve our shared vision of a more representative workforce that aligns the right skills, powers and experience to meet challenging requirements, better consistency in data gathering is required across all protected characteristics.[7] The NPCC has pledged to cultivate a better understanding of the composition of the workforce, by ensuring that systems are in place that enable workforce data to be collected, collated and analysed across the nine protected characteristics.[8] Standardised diversity codes have been developed to support future monitoring. In 2021, we were able to include robust data from the Home Office national workforce census in the EIA. Due regard to the equality aims is an ongoing commitment and this EIA serves to document key considerations. We will continue to work with our stakeholders to develop more comprehensive national workforce data.

22.   We understand that there is a national issue with reluctance to share protected characteristic information from much of the workforce. We are undertaking research into potential challenges. Working with our stakeholders, we will work to resolve the issue and improve the rates of information sharing by our workforce. The workforce should be encouraged to understand the importance of providing protected characteristic information and the significance of this information in supporting the policing community.

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[6] NPCC. (2018). 'Diversity, Equality & Inclusion Strategy 2018 - 2025' [internet]. Available from npcc.police.uk/documents/edhr/2018/NPCC%20Diversity%20Equality%20Inclusion%20Strategy%20May%202018.pdf [Accessed September 2019]
[7] Ibid
[8] Ibid

The 'Safe to Say' campaign and the 'Sharing Information' guidance explores these challenges. The guidance will be released soon.

College-led data collection

23. In January 2020, the College requested diversity data from forces. At the time of data collection three forces had implemented the new PCSO entry routes: Surrey, Sussex (first cohort in March 2019) and Thames Valley Police (first cohort in January 2019).

24. Data was requested in January 2020. All three forces were provided with a data collection template to facilitate return of anonymised diversity data. The last data return was received in March 2020.

25. All three forces returned data against the majority of the protected characteristics. However, there was some deviation in return:

   ▪ one force had used their own subsets under age

   ▪ one force had combined the 'marriage' and 'civil partnership' sub-sets

   ▪ one force did not collect data against 'pregnancy and maternity'

   ▪ only two out of three forces returned data for those not recruited.

   Figures for the three forces have been consolidated where possible given the inconsistencies noted. These are provided in Appendix 3.

26. For some of the protected characteristic categories, the cumulative total from the subsets did not correspond with the expected total. This may have been where candidates did not return any information against that protected characteristic. However, only one force shared non-disclosure data with us. We will ensure that the data collection template is modified for future data collection exercises, to encourage forces to formally record non-disclosure figures. Further information can be found in Appendix 3.

27. A total of 163 new PCSOs were recruited by the three forces. This is a small sample size and the forces are only in the first year of implementation. Any analysis of the new routes' impact on recruitment demographic will be limited. As more forces transition to the new routes, more data will become available for us to draw our evaluation from.

28. Part of the solution required to meet the difficulties encountered with data standardisation is a diversity data code national standard. As above, we have worked with stakeholders to develop this and a national diversity code standard has been implemented.

The Home Office Police Workforce Census

29. The significant limitations on accessing data have prompted the need for a long-term practical solution. We also received feedback to indicate that much of the difficulty in providing a response is the frequency with which forces are asked to meet workforce data requests from multiple agencies. We have reduced this pressure for forces by working with the Home Office to integrate entry route information into the Home Office Police Workforce Census. The census data will form the basis of subsequent analysis.

30. The Home Office Police Workforce Census is an annual census of all police officers and staff in England and Wales. It is an individual record-level data collection of all workers in the police service. Data is collected from Human Resources and Finance teams in the 43 territorial police forces in England and Wales, as well as the British Transport Police. It provides national, consistent and robust workforce data, comparable with the Home Office Annual Data Return (ADR). It represents a long-term solution to diversity data collection challenges. We worked with the Home Office to include the new entry routes for policing in the 2020 census, including the PCSO entry routes. As a recent amendment to the census, the provision of entry route data in the first year of inclusion was voluntary.

31. The census has provided data on each of the entry routes for those joining in the 2019/20 financial year by the following characteristics: age, disability, race and sex. From 2021, the census will seek to collect data on more of the protected characteristics, though the quality of data will be dependent on the information held and submitted by forces. Once incorporated, the census will provide workforce data for each entry route and all protected characteristics. The 2020 census received returns from 38 forces. However, there were no returns against the PCSO routes. The data featured in this document is from the College led data collection. Future updates will rely on the census.

32.   Improving census completion among the remaining forces is a priority for the Workforce Data Group. A work-stream has been established to achieve 100% completion in 2021. By the next census collection, more forces will have implemented the PCSO routes and we will have a robust source of data to use in this EIA.

Stakeholder engagement

33.   In support of the development of the updated curriculum, we have received invaluable input from a project development working group comprised of diverse representation of key stakeholders. Diversity considerations have been integrated into product development throughout the design phase. Feedback is also gathered through ongoing engagement with the PEQF Implementation Reference Group (IRG), the Initial Policing Education Board (IPEB) and the PEQF Board. These groups are also made up of a cross-section of representatives from policing and other key stakeholders.

34.   Forces receive ongoing support from our implementation officers and from the College's diversity and inclusion team. We produce guidance and run a variety of workshops, seminars and other events to support implementation. A dedicated knowledge hub[9] has been created for forces to learn more about the EIA process and to share learning with other forces. There is also a dedicated knowledge hub for diversity, equality and inclusion. Forces can use this hub to share resources and examples of effective practice.

Force EIAs

35.   The EIA process is designed to ensure that, as policies are developed and changed, they do not have a discriminatory or other negative impact on protected groups. If choosing to introduce the PCSO entry routes, forces will be required to develop their own EIAs, evidencing how equality, diversity and inclusion are embedded in their delivery infrastructure as per the PSED. This is a core requirement that must be met as part of the College's quality assurance process. We will request that forces consider the equality

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[9] An information-sharing and collaboration platform.

considerations of their intended model of delivery and integrate these considerations into all aspects of implementation. Forces will be asked to include equality, diversity, inclusion and widening participation considerations, including but not exclusive to:

- where learning takes place

- proximity (for example, reasonable adjustments for students with disabilities)

- duration over which it takes place (for example, varying part-time working)

- assessment arrangements

- educational and pastoral support and resources

36. We will encourage forces to consider other characteristics that may be pertinent to the local demographic, such as socioeconomic status, the prevalence of PCSOs with caring responsibilities and English as a second language.

37. We will ask forces to identify engagement activities with the aim of enabling equality of opportunity for all. We will also support forces in meeting their equality duty by reminding forces that the EIA is a living document, to be reviewed and updated on an ongoing basis. We will encourage forces to collect protected characteristic data as part of the ongoing management of the programme.

Other considerations

38. The government pledged to increase police recruitment targets by 20,000 with the launch of the Policing Uplift Programme. This ongoing recruitment drive may have an impact on the number of people applying to become PCSOs.

39. COVID-19 has imposed an unprecedented challenge on the police service. As implementation is not compulsory, it is unknown to what extent the pandemic has affected forces' capacity to introduce the new programme. Many forces have thought dynamically about promoting recruitment in a time of social distancing. Social media and other online platforms are being used extensively and in engaging ways.

Impact analysis

40. The Policing Vision 2025 states: 'Policing is built on our people. There is a need to add critical new skills to the service, get the right mix between officers and staff and be more representative of the communities we serve to achieve our vision'.[10] It is imperative that any new workforce development initiative serves to support policing to reach this objective.

41. The new PCSO entry routes bring many benefits to policing, such as:

   ▪ supporting educational equality within policing

   ▪ proactively embedding equality, diversity and human rights considerations as a core function of policing practice

   ▪ strengthening engagement skills to foster effective partnerships in community policing

   ▪ paying due regard to all protected groups, with this regard contributing directly to programme development, implementation and delivery

The protected characteristics

42. The College and the police service are committed to meeting the equality duty and to ensuring that all protected characteristics are given due consideration. We are firm on the point that there is no hierarchy to the protected characteristics. While this EIA explores all of the protected characteristics, the availability of Home Office national workforce data for age, race and sex has facilitated further exploration of these characteristics. The impact on individuals who identify with the other protected characteristics is mainly unknown at present. This is primarily due to a lack of data or relevant research. We welcome further data and evidence from forces to facilitate further analysis.

43. It is also important to consider the impact of intersectionality. Intersectionality means recognising that people's identities are shaped by multiple factors (the

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[10] NPCC. (2018). 'Diversity, Equality & Inclusion Strategy 2018 - 2025' [internet]. Available from npcc.police.uk/documents/edhr/2018/NPCC%20Diversity%20Equality%20Inclusion%20Strategy%20May%202018.pdf [Accessed September 2019]

many personal characteristics that make up an individual). Protected characteristics cannot be treated as discrete identities, as they can quite often overlap when discrimination occurs. An awareness of intersectionality creates a much better understanding of the differences among individuals.

44.	In addition to the protected characteristics, we are aware that forces are becoming increasingly concerned about the impact that the new entry routes may have on different socioeconomic groups. 'Socioeconomic' considers how the combination of 'social' and 'economic' factors, such as class, have the potential to hinder certain groups' prospects. It is included in this EIA to raise awareness and consideration of possible mitigations.

45.	The equality impact should be reviewed in the context of the reduction in the PCSO workforce. Home Office workforce figures confirm a decrease of 2,637 PCSOs since 2015.[11] There was a 4% reduction in PCSO volume between 2019 and 2020.[12] Conversely, between 2020 and 2021, there was a 0.4% increase in the number of PCSOs.[13]

Year	Total number of officers[14]
2015	11,817
2016	10,551
2017	10,213
2018	10,139

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[11] Home Office. 'Police workforce England and Wales statistics' (internet). Assorted documents available from gov.uk/government/collections/police-workforce-england-and-wales [Accessed March 2020]

[12] Flatley J. (2020). 'Police Workforce, England and Wales, 31 March 2020' [internet]. Home Office Statistical Bulletin, July 11/19. London: Home Office. Available from assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/905169/police-workforce-mar20-hosb2020.pdf [Accessed September 2020]

[13] Flatley J. (2021). 'Police workforce, England and Wales: 31 March 2021' [internet]. Available from gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2021/police-workforce-england-and-wales-31-march-2021#diversity [Accessed September 2021]

[14] Data collated from Home Office workforce data between 2015 and 2021.

2019	9,547
2020	9,248
2021	9,284

Age

46. **Consideration:** 2020 Home Office workforce data[15] provides the following age breakdown for PCSOs:

Age range	Proportion of PCSO workforce 2020 (%)	Proportion of PCSO workforce 2021 (%)
25 or under	14	13
26 to 40	40	40
41 to 55	33	34
Over 55	14	13

47. Overall, there is little differentiation between 2020 and 2021. There is a marginal decrease in the proportion of officers in the 25 and under age group and the over 55 age group. The figure for the 26 to 40 age group remains unchanged.

48. **Consideration:** The age profile of apprenticeship starters changed between 2018/19 and 2019/20, with a higher proportion of starts from apprentices aged over 24. This is consistent with the trend found between 2017/18 and 2018/19. As high as 47% of apprenticeships started in 2019/20 were by

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[15] Flatley J. (2021). 'Police workforce, England and Wales: 31 March 2021' [internet]. Available from gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2021/police-workforce-england-and-wales-31-march-2021#diversity [Accessed September 2021]

people aged 25 and over.[16] This data suggests that the misconceptions surrounding apprenticeships may be on their way to being remedied as awareness of the value of apprenticeships begins to grow. For employers, apprenticeships serve as a unique opportunity to diversify their existing workforce. For an older candidate, the apprenticeship may facilitate a career change or be a valued opportunity to return to employment.

49.   **Consideration:** There is concern that older candidates are more likely to have caring and/or family commitments which will limit the amount of available time they can commit to a level 4 learning programme. Some of these candidates may have been out of education or training for some time and could be disadvantaged by the study components of the new routes.

50.   **Consideration:** The Skills Index 2021 is a national study of the UK's labour market that explores the skills and employment landscape. The report highlights that a third of workers aged over 55 have not received any formal workplace training in the last decade, a much higher proportion than all other age groups.[17] This is consistent with anecdotal evidence indicating that older workers are often overlooked for training in favour of younger colleagues. This is further compounded by ageist stereotypes about older workers being less willing and less able to develop new skills. Only one in seven firms stated that they would recruit or retrain older workers to tackle skills shortages. The potential for systemic ageism may be an obstacle for older applicants.

51.   **Mitigation:** It will not be compulsory for forces to implement the new routes. However, they have been carefully developed to provide PCSOs with skills critical to 21st-century policing. The curriculum provides comprehensive coverage of the knowledge, skills and professional approaches that the PCSO role demands. This may be beneficial for increasing retention and widening

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[16] Foley N. (2021). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed August 2021]
[17] City and Guilds Group. (2021). 'Skills Index 2021' [internet]. Available from cityandguildsgroup.com/-/media/cgg-website/documents/cg-skills-index-report-pdf.ashx?la=en&hash=B04AAEA0DBBF4F4A9203BBF024350A7C1B07257A [Accessed August 2021]

participation to provide the opportunity for PCSOs who wish to become police officers.

52.   Forces will be encouraged to work with providers to ensure that learning provision is accessible to all candidates irrespective of their age. For example, part time options have proven successful in attracting those who would find balancing study and work particularly challenging. This has the potential to greatly benefit those with caring or family commitments.

53.   Forces are encouraged to review their recruitment and selection processes to ensure that they can attract and engage a wide range of candidates. They should ensure that they do not allow ageist stereotypes to influence decision making or to create limitations upon older applicants and recruits. Monitoring the age demographic of applicants and recruits will help to ensure that there is no possibility of discrimination and that equality of opportunity is maintained.

54.   Access courses and other bridging programmes could be made available to equip students who have been away from study. Support could also be given to those who do not hold academic qualifications or who could benefit from study skills training.

55.   Forces are encouraged to monitor the average age of those wishing to pursue the apprenticeship option and collect feedback about the new routes. If distinct patterns begin to emerge, a closer review and mitigations may be required.

56.   **Key PSED objective(s) considered:**[18] Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

Data

57.   For the two forces using the College age subsets, the highest number of new PCSOs were aged under 30 with 87% of recruits falling into the 18-30 age group. Similar findings were also true of the force that applied their own

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[18] Readers should note that inclusion of one part of the equality duty in this section is intended only to draw specific attention to a particularly relevant part of the duty. Due regard should be given to all parts of the duty. It is worth adding that the College and the police service are committed to a continuing regard of all components of the equality duty.

subsets, with the younger age categories (16 to 24 and 25 to 34) making up the majority of new PCSOs. There were far fewer new PCSOs for the 46 and above categories though this age range also featured the lowest number of applications. For the force using its own subsets, recruitment rates were just over 6% higher for the 45 to 54 age group than the 16 to 24 age group. These initial figures do not indicate any deviation from current workforce age demographic trends, with the majority of PCSOs below the age of 40 (54%).[19]

Disability

58.   Under the EqA, a person has a disability if they have a physical or mental impairment that has a substantial and long-term effect on their ability to carry out day-to-day activities. It is estimated that 19% of the UK population share a disability.[20]

59.   **Consideration:** The entry routes must not impose any obstacle on those with a disability. Staff associations and other stakeholders have raised concerns that people with learning difference could be disadvantaged by the new routes. There is long-standing concern about how the programme may impact on people with a disability generally but the National Disabled Police Association have raised particular concerns around 'hidden disability'. This includes conditions such as dyslexia or poor mental health. It is estimated that one in every 10 people has dyslexia[21] and one in four people experience a mental health problem each year.[22] In any given week, one in six people experience a common mental health problem (for example anxiety and depression).[23]

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[19] See paragraph 34 for further information.
[20] Department for work and pensions. (March 2018). 'Family Resources Survey 2016-17' [internet]. Available from
assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692771/family-resources-survey-2016-17.pdf [Accessed February 2020]
[21] NHS. (July 2018). 'Overview Dyslexia' [internet]. Available from nhs.uk/conditions/dyslexia/ [Accessed February 2019]
[22] Mind. (April 2017). 'Mental health facts and statistics'. Available from mind.org.uk/information-support/types-of-mental-health-problems/statistics-and-facts-about-mental-health/how-common-are-mental-health-problems/ [Accessed February 2019]
[23] Ibid

60. **Consideration:** In 2019/20, 12% of apprenticeship starters identified as having a learning difficulty or disability. [24] This is an increase from previous years, with a total of 11.2% in 2017/18 and 11.8% in 2018/19.[25]

61. National data and evidence around how many PCSOs identify as having a disability is not currently available.

62. **Mitigation:** All organisations, including the police service, have a statutory obligation to provide reasonable adjustments for people with a disability. Forces are encouraged to review their reasonable adjustment policies to ensure that they are fit for purpose. Forces should be taking action to ensure that the workplace is an inclusive space, and that people can confidently declare a disability and request reasonable adjustment.

63. Forces and education providers should be aware that the reasonable adjustment duty is an anticipatory duty, and that these considerations should be integrated into programme implementation. This includes initiatives such as ensuring that written training content conforms to style guides for neurodiversity, or producing training in different formats. We have worked with the PUP and Purple Space to develop research to further our understanding of how forces are supporting those in their workforce with a disability. The **discovery report** shares learning from the experiences of officers and staff in relation to workplace adjustment and disability confidence.

64. Early identification of a learning difference or disability will allow forces and learning providers to better support candidates through recruitment, selection and progression. Greater awareness of disabilities such as neurodiversity has led to people accessing screening assessments or seeking formal diagnostic via the NHS. Long NHS waiting lists mean that many people live with neurodiversity without having received a formal diagnostic. Candidates should

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[24] Foley N. (2021). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed April 2020]
[25] Foley N. (2020). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed April 2020]

be encouraged to be open with any concerns so that support mechanisms can be put in place where necessary.

65.   Forces may wish to revisit their staff mental health approaches and ensure engagement with national police wellbeing services, such as **Oscar Kilo**. A robust approach that integrates disability confidence and mental health awareness into organisational development and pastoral support, will help to support the workforce.

66.   The workforce may be upskilled by disability awareness training and starting honest conversations about disability and inclusion. The force may also wish to direct PCSOs to third-party professional development hubs that offer additional support for people with disability.

67.   The College is a member of policing's national neurodiversity working group. The group aims to develop an informative and concise resource that will equip forces to provide a consistent, effective and professional service for neurodiverse members of the public. It will also support workforce inclusion. The group's work will include consideration of the progression and retention of those in the workforce who are neurodiverse. The group have recently developed a **neurodiversity glossary of terms**.

68.   **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

Data

69.   The overwhelming majority of PCSO recruits did not identify as having a disability (155 in total or 95% of all new recruits). Only five recruits identified as having a disability. This places the percentage of recruited PCSOs with a disability at only 3%. This is significantly lower than the average of 12% for apprenticeship starts by people with learning difference or disability, and lower than the 19% proportion of the general population.[26] However the sample size is small and the low percentage does not necessarily point to the presence of

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[26] See paragraphs 47 and 48.

an obstacle or access issue. The majority of candidates chose not to share this information

Gender reassignment

70. **Consideration:** The police service have taken steps to promote trans inclusion. All forces work with the NPCC guidance on gender reassignment [27] and the toolkit for managers and staff.[28] We are aware that many forces have gender reassignment policies and processes in place to support those who wish to transition. Many forces have had experience of supporting officers undergoing gender reassignment. Several forces feature on the Stonewall UK Workplace Equality Index. Research indicates that half of trans and non-binary people have hidden the fact that they are LGBT at work for fear of discrimination.[29] We understand that there is more that can be done to support people undergoing gender reassignment, and that more research is required to build an evidence base.

We do not anticipate that the new PCSO entry routes will have a detrimental impact on this protected characteristic. However the introduction of new routes serves as an invitation for forces to review their policies to help ensure trans inclusion. Implementing forces must consider the extension to delivery timelines, should they be required to support those taking extended absence for gender reassignment purposes.

71. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

Data

72. A total of 138 recruits did not identify with this characteristic (85%). Fewer than five people who had applied did identify with this characteristic but were

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[27] Stonewall. (Date unknown). 'Trans guidance for the policing sector' [internet]. Available from npcc.police.uk/2018%20FOI/EDHR/Trans%20Guidance%20for%20the%20Policing%20Sector%20Individual.pdf [Accessed February 2020]
[28] LGBT Police. (2019). 'LGBT Resources' [internet]. Available from lgbtpolice.uk/resources [Accessed September 2019]
[29] Bachmann CL and Gooch B. 'LGBT in Britain: Trans report' [internet]. Stonewall. Available from stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf [Accessed September 2019]

not successful in their application. A total of 871 people who did not identify with this characteristic were not successful in their application. As more forces implement the new routes, we will undertake further data collection to ensure that we have an evidence base to assess whether there is any impact on this protected characteristic.

Marriage and civil partnership

73. The impact of the new entry routes on those who are married or in a civil partnership is unclear at present. We welcome any information or data on this.

Data

74. The majority of new recruits were not married or in a civil partnership (44%). Only 17% of new recruits shared that they were married or in a civil partnership. A high number of people chose not to share information about this protected characteristic with 30% of those recruited not confirming their status or choosing 'prefer not to say'. There are no national workforce figures with which to make a comparison

Pregnancy and maternity

75. Governance of maternity leave is organised by the force. EqA protections will start from the beginning of the pregnancy to at least two weeks after the end of the pregnancy.

76. **Consideration:** Implementing forces must consider extension to standard delivery timelines, should they be required to support individuals taking extended absences due to pregnancy or maternity. Forces may wish to use the introduction of the new routes to prompt a review of existing policies to ensure that they are fit for purpose and able to support those with this protected characteristic.

77. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity.

Data

78.   None of the new recruits were currently on adoption, maternity or paternity leave. There is no information to indicate at this stage whether the new routes impact upon this protected characteristic.

Ethnicity

79.   **Consideration:** Home Office workforce data tells us that the PCSO workforce is one of the most ethnically diverse portions of the workforce with 10%[30] identifying as Black, Asian and minority ethnic.[31] Ethnic minority representation for police officers is 7.6%.[32] While representation across the service is growing, the 14% ethnic minority[33] population of England and Wales confirms that under-representation is still a crucial issue.

80.   Unison research indicates that the number of PCSOs identifying as Black, Asian and minority ethnic has fallen significantly since 2005 (14%).[34]

Year	Percentage of PCSOs who identified as Black, Asian and minority ethnic (%)
2005	14.0
2006	15.0
2007	12.0

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[30] Flatley J. (2021). 'Police workforce, England and Wales: 31 March 2021' [internet]. Available from gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2021/police-workforce-england-and-wales-31-march-2021#diversity [Accessed September 2021]
[31] 'Black, Asian and Minority Ethnic' in this instance follows the Home Office counting rules and does not include White minorities. As per Home Office rules, White minority groups fall under the 'White' sub-set. However, many of the concerns included in this assessment may impact all minority groups.
[32] Ibid
[33] As per the 2011 census. The 2021 census is likely to confirm a rise to this figure.
[34] Unison. (2019). 'Police staff now less representative of communities' [internet]. Available from unison.org.uk/news/press-release/2019/02/police-staff-now-less-representative-communities-says-unison/ [Accessed March 2019]

Year	Percentage of PCSOs who identified as Black, Asian and minority ethnic (%)
2008	11.0
2009	11.5
2010	11.0
2011	10.7
2012	10.0
2013	9.5
2014	9.1
2015	9.1
2016	9.5
2017	9.6
2018	9.5

81. Home Office data suggests a reversal of the decline in representation of ethnic minority groups, with national workforce figures stabilising at 10% between 2019 and 2021. Currently, only a handful of forces have implemented the new PCSO pathways. With so few having undertaken implementation, we are unable to establish if the new pathway has had any bearing on maintaining ethnic minority representation.

82. The police service understands that this is not a time to be complacent. Diversity and inclusion and positive action teams in forces are working hard to promote the police service as an employer of choice for all protected groups.

Forces should have a clear zero-tolerance approach to discriminatory behaviours. Senior leaders should be diversity champions and should mobilise their workforce to support equality and inclusion.

83. The PCSO entry routes – both old and new – and the efforts undertaken by forces to promote inclusion cannot have exclusive influence on policing's appeal as an employer to minority groups. Policing's appeal as a career is posited in a broad socio-political context that is both historical and contemporary. The fundamental errors identified in the Stephen Lawrence Inquiry,[35] the disproportional representation in the criminal justice system reported in the Lammy Review,[36] and the most recent criticism of disproportionality in stop and search[37] are only a few of the many pertinent issues shaping perceptions of police culture and legitimacy. Disproportionality in public confidence was highlighted in 2021's Macpherson report, with only 56% of Black adults believing that they will be treated fairly by police, compared to 67% of White adults.[38] All of these factors will compound to have an inevitable impact on whether policing is seen as an appealing career choice. To quote the Macpherson report, '…individuals from BME communities are deterred from joining the police by deeply entrenched and historic negative perceptions of police and policing'.[39]

84. Police leaders have committed to a comprehensive review of inclusion in the service, the reach of which will extend to also affect the PCSO workforce. The Police Plan of Action on Inclusion and Race will aim to address longstanding challenges in policing and race. The project will be a collaborative initiative led

[35] Macpherson, W. (1999). 'The Stephen Lawrence Inquiry' [internet]. London: Government publishing service. Available from assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277111/4262.pdf [Accessed February 2021]

[36] Lammy D. (2017). 'Lammy Review: final report' [internet]. London: Government publishing service. Available from gov.uk/government/publications/lammy-review-final-report [Accessed February 2021]

[37] HMICFRS. (2021) 'Disproportionate use of police powers: A spotlight on stop and search and the use of force' [internet]. London: Justice Inspectorates. Available from justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/disproportionate-use-of-police-powers-spotlight-on-stop-search-and-use-of-force.pdf [Accessed March 2021]

[38] House of Commons Home Affairs Committee. (2021). 'The Macpherson Report: Twenty-two years on' [internet]. London: House of Commons. Available from committees.parliament.uk/publications/7012/documents/72927/default/ [Accessed August 2021]

[39] Ibid

by the NPCC, with partners from across policing, including the College, staff associations, and police and crime commissioners. A supporting programme will run for at least two years to deliver the plan of action. The action plan will send a positive message to potential candidates of the service's commitment to eliminate inequality and promote inclusion. In August 2021, barrister Abimbola Johnson was appointed as independent chair of the action plan's Independent Scrutiny and Oversight Board. The Board will provide external oversight to help shape, check and challenge the action plan. There will be ongoing collaboration, knowledge sharing and partnership working with the PEQF team.

85.   **Consideration:** The proportion of apprenticeship starters from ethnic minority backgrounds increased from 11.2% in 2017/18 to 12.3% in 2018/19, and to 13.1% in 2019/20.[40] The number of apprenticeship starts between 2018/19 and 2019/20 increased from 25,000 to 26,000.[41] Unfortunately, there is no data to indicate the popularity of level 4 apprenticeships for particular ethnic groups.

86.   **Mitigation:** Feedback from stakeholders suggests that a level 4 qualification would be attractive to ethnic minority communities. Forces will be encouraged to collect and analyse data relating to the ethnicity of their PCSO workforce. This data will help to inform an understanding of participation, identify limitations and support equality. Forces are encouraged to foster an inclusive environment that is conducive to candid and confident declaration.

87.   Forces may wish to make the PCSO role more appealing to people who identify as having an ethnic minority background via targeted marketing initiatives and by offering specific support opportunities for personal development, such as mentoring and encouraging connections with staff associations.

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[40] Foley N. (2021). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed September 2021]
[41] Ibid

88.   We will support forces by facilitating the sharing of emerging practices via the **National Police Jobs and Opportunities Virtual Platform**. The platform provides both internal (force to force) and external (force to candidate) information sharing areas.

89.   The government has committed to increasing the number of apprentices with ethnic minority backgrounds and have established the **Apprenticeship Diversity Champions Network** (ADCN). The ADCN champions apprenticeships and diversity amongst employers and encourages more people from underrepresented groups to consider apprenticeships. Forces implementing the apprenticeship entry route for PCSOs could benefit from the collaboration opportunities and resources developed by the ADCN and may wish to seek out connecting with the network.

90.   **Key PSED objective(s) considered:** Advance equality of opportunity. Foster good relations.

Data

91.   The majority of new recruits identified as White English/Welsh/Scottish/Northern Irish/British with 130 new recruits falling under this category (80%). A total of 11 people identified with a White minority category (either White – Irish or White – any other White background). There were fewer than five candidates for each of the following categories: Asian – Indian, Asian – Pakistani, Asian – Any other Asian background, Black – African, Mixed – White and Asian, Mixed – White and Black African. These figures place the recruitment ratio of White candidates at 87% and at 5% for ethnic minority candidates. There are no national PCSO ethnicity joiner figures with which to make a comparison. These limited findings may provide some foundation for future comparative analysis.

92.   The ethnic minority representation in the PCSO workforce is currently 10%. The figure here is lower than the national PCSO workforce average, however it is helpful to note that the national average is influenced by areas where there are high levels of ethnic diversity in the local demographic. The current sample of only three force areas should not be used as a projection for the national picture. As more forces implement the new routes, the College will

undertake further data collection to ensure that we have an evidence base to assess whether there is any impact on this protected characteristic.

Religion or belief

93. **Consideration:** Applicants who adhere closely to religious rites may fear that the new programme places additional demands on the PCSO role, therefore affecting their ability to conduct religious observance.

Mitigation: Engagement with various staff associations have suggested some useful approaches taken by forces and learning providers in supporting these groups. Suggestions include:

- prayer room/s to facilitate private prayer

- recognition and celebration of religious festivals (this should also be considered when setting timetables and shift patterns)

- approving religious accessories as part of uniforms (for example hijabs for Muslim female PCSOs)

- different learning opportunities to reflect religious diversity (for example inputs from religious speakers on community cohesion)

- engagement with local religious and non-belief groups and staff associations

94. Forces should consider extension to standard delivery timelines, should they be required to support individuals taking extended absences due to pilgrimage or other religious rites.

95. To promote inclusion, forces can issue guidance on important points from relevant policies, such as prayer times and pilgrimage. Positive messages about the force's awareness and ability to accommodate individuals from all religions can be integrated into key marketing messages and reasserted at outreach events. Reassurances could be made to leaders of local faith groups, who could further disseminate positive messaging.

96. The College have worked with the **National Association of Muslim Police** and the **National Sikh Police Association** to develop **guidance on faith in the workplace**. The guidance raises awareness and includes information for

forces on how they can support inclusion. We hope to work with other staff networks to produce further information. We are currently working with the Jewish Police Association on guidance on how forces can better support Jewish officers and staff. There are future plans to work with the Police Pagan Association on guidance around the Pagan faith.

97. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

98. **Consideration:** There is currently no national data on the religious demographic of PCSOs. We will encourage forces to collect and monitor data in respect of this protected characteristic to establish an understanding of participation and potential disadvantage or inequality. The census will also collect this information going forwards. We recognise the importance of robust workforce data collection for forces' ability to assess equality impact. We are working with the NPCC and other partners on how we can promote information sharing in the workforce.

99. **Key PSED objective(s) considered:** Advance equality of opportunity.

Data

100. The majority of PCSO recruits did not identify with any religion or belief, with 52% of PCSO recruits selecting this category. A total of 26% of recruits identified with a Christian denomination. There were fewer than five candidates for each of the following categories: Muslim, Sikh or Any other religion. As such, minority religious groups account for less than 5% of all new recruits.

101. The sample size is small and is only represents three forces. These figures may not be indicative of barriers against minority religious groups. However, it is a situation which ought to be monitored. Forces may wish to undertake a granular assessment of their PCSO recruitment process to identify whether there is a particular stage that candidates who identify with a minority religious group fail.

102.   There are no national workforce figures with which to compare these figures. However, further diversity data collections will enrich our understanding of the religious demographic of the PCSO workforce.

Sex

103.   **Consideration:** Females make up 47% of the PCSO workforce.[42] This is an increase of 1% from the previous year and significantly higher than the 32.4% female representation for police officers, though still below the national demographic average of 51%.[43]

104.

Year	Percentage of PCSO workforce who identified as female[44]
2016	45.1
2017	45.0
2018	45.3
2019	46.0
2020	46.0
2021	47.0

[42] Flatley J. (2021). 'Police workforce, England and Wales: 31 March 2021' [internet]. Available from gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2021/police-workforce-england-and-wales-31-march-2021#diversity [Accessed September 2021]
[43] Office for National Statistics. (2018). 'Male and female populations'. Available from ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/male-and-female-populations/latest [Accessed February 2019]
[44] Home Office. 'Police workforce England and Wales statistics' (internet). Assorted documents available from gov.uk/government/collections/police-workforce-england-and-wales [Accessed March 2020]

Figures between 2016 and 2019 indicated an incremental increase to the number of female PCSOs. This trend continued between 2020 and 2021.

105. **Consideration:** In 2018/19, there were slightly more females starting an apprenticeship (50.1% compared with 49.9%). With the exception of 2017/18, the figure for female apprenticeship starters has exceeded those for males since 2010.[45] This trend was reversed in 2019/20, with slightly more men than women starting apprenticeships at 51.2%.[46]

106. **Mitigation:** We will monitor the data closely to understand the impact of the new programme on female representation, and to try to understand any potential barriers or inequality.

107. Forces may wish to make the PCSO role more appealing to women via targeted marketing initiatives and by offering specific support opportunities for personal development, such as mentoring and encouraging connections with staff associations.

108. **Key PSED objective(s) considered:** Advance equality of opportunity. Foster good relations.

109. **Consideration:** The higher probability of women having caring responsibilities may have an impact on interest in the new routes. While caring responsibility is an issue relevant to both sexes, women aged between 45 and 54 are more than twice as likely as other carers to have reduced working hours due to caring responsibilities.[47] The number of lone-mother families far exceeds the number of lone-father families.[48] Childcare disparity has been acknowledged in the courts, with a 2021 tribunal confirming that

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[45] Foley N. (2020). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed April 2020]
[46] Foley N. (2021). 'Apprenticeship statistics' [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed August 2021]
[47] Carers UK. (2016). '10 facts about women and caring in the UK on International Women's Day' [internet]. Available from carersuk.org/news-and-campaigns/features/10-facts-about-women-and-caring-in-the-uk-on-international-women-s-day [Accessed October 2019]
[48] Office for National Statistics. (2019). 'Dataset: Families and households' [internet]. Available from ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/datasets/familiesandhouseholdsfamiliesandhouseholds [Accessed March 2020]

courts ought to acknowledge the differences in childcare duties between women and men.[49] Recent research from charity Working Mums indicate that 48% of the mothers they surveyed, stated that the inaccessibility of wraparound childcare is affecting their career progression. A quarter of mothers said that wraparound childcare was not an affordable option.[50] A TUC and Mother Pukka survey found that 63% of mothers surveyed had insufficient childcare for the summer holiday period. Nearly half said they were managing childcare through flexible working and many have had to negotiate reduced work hours or unpaid leave.[51] There may be concern from those with caring responsibilities that the new entry routes will impose additional challenges and demands on their time.

110. **Mitigation:** Forces are encouraged to be proactive in monitoring the situation. Mitigations will need to be considered if evidence indicates that a negative impact on recruitment or retention exists.

111. Forces will be encouraged to work with providers to ensure that learning provision is accessible to all candidates irrespective of their sex. For example, part time options have proven successful in attracting those who would find balancing study, work and other commitments particularly challenging. This has the potential to greatly benefit those with caring or family commitments.

112. **Key PSED objective(s) considered:** Advance equality of opportunity.

Data

113. The majority of new PCSO recruits were male with 53% of recruits identifying with this category. Females accounted for 44% of recruits, producing a differential of 9%. This is significantly higher than the 30% female representation for police officers though 2% lower than the current figure for female PCSOs. For the two forces that returned 'total not recruited data',

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[49] Dobson v North Cumbria Integrated Care NHS Foundation Trust [2021] UKEAT/0220/19/LA
[50] Garner M. (2021). '48% of mums say wraparound childcare is affecting their career progression' [internet]. Available from workingmums.co.uk/48-of-mums-say-wraparound-childcare-is-affecting-their-career-progression/ [Accessed August 2021]
[51] TUC. (2021). 'TUC: Nearly two-thirds of working mums don't have enough childcare for school summer holidays' [internet]. Available from tuc.org.uk/news/tuc-nearly-two-thirds-working-mums-dont-have-enough-childcare-school-summer-holidays [Accessed July 2021]

there was only a 1% difference in recruitment rate between male and female candidates. Fewer than 5 people identified as intersex were recruited, compared to 34 people who identified with this category who were not recruited.

Sexual orientation

114. **Consideration:** The potential impact of the programme on PCSOs who identify as LGBT+[52] is unclear. There is unfortunately no workforce data on this protected characteristic with which we will be able to draw comparative analysis. As with all protected characteristics, the routes have been developed to ensure that there is no adverse impact on this protected group.

115. **Mitigation:** Forces will be encouraged to collect and analyse data relating to the sexual orientation of their PCSO workforce. This data will help to inform an understanding of participation, identify limitations and support eradication of any inequality. Forces are encouraged to foster an inclusive environment that is conducive to candid and confident declaration.

116. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

Data

117. The majority of recruits identified as heterosexual (78%). A total of 4% identified as gay or lesbian. Less than 3% of recruits identified as bisexual. Quite a high figure (15%) preferred not to say. There are no national workforce figures with which to compare these figures. Further diversity data collections will improve our understanding and will allow us to identify if there are any obstacles for this protected characteristic.

Socioeconomic status

118. The extent to which people from different socioeconomic backgrounds are represented in policing is unclear at present. This is partly due to a lack of robust data collection, both at a local and national level, and also because

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[52] Lesbian, gay, bisexual, transgender and other identifying orientations.

there is no clear, single definition. Socioeconomic background and/or status requires an understanding of a range of different factors.

119.   In 2018, the Civil Service worked with a range of employers, industry partners and experts to develop four socioeconomic background measures.[53] These measures are:

- parental qualifications

- parental occupation

- type of school attended

- eligibility for free school meals

120.   The Social Mobility Commission's (SMC) report 'State of the Nation 2021' explores the impact of COVID-19 on social mobility. It identified that across the UK, attainment gaps between advantaged and disadvantaged children are getting wider, with the impact of COVID-19 threatening to make poor figures against each critical measure of social mobility worse. Research indicated that a person is 60% more likely to get a professional job if they come from a privileged background rather than a working-class background. In England, disadvantaged primary school pupils were a total of seven months behind their more privileged peers.[54] Reviewing corresponding data from the ONS allows analysis of the intersection between child poverty and ethnicity. Their evidence suggests that poverty and social deprivation is linked to educational underachievement, employment and earning opportunities.[55] The ONS research explains that the relationship between poverty and education outcomes is complex and influenced by many different factors. There is a high

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[53] Civil Service. (2018). 'Measuring Socio-economic Background in your Workforce: recommended measures for use by employers' [internet]. Available from assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/786937/Measuring_Socio-economic_Background_in_your_Workforce__recommended_measures_for_use_by_employers.pdf [Accessed June 2018]

[54] Ibid

[55] Office for National Statistics. (2020). 'Child poverty and education outcomes by ethnicity' [internet]. Available from ons.gov.uk/economy/nationalaccounts/uksectoraccounts/compendium/economicreview/february2020/childpovertyandeducationoutcomesbyethnicity#child-poverty-education-and-ethnicity [Accessed August 2021]

prevalence of poverty among some ethnic minority groups. For example, Pakistani and Bangladeshi households are 2.8 and 2.4 times more likely to be low-income households compared to White British households. However, this does not default to low educational outcomes. Pakistani and Bangladeshi pupils who were eligible for free school meals progressed higher than the national average of all pupils. Data for Black households, where one third of children live in low-income households, showed lower than average scores. There is also variance when considering the intersection with sex, with girls on free school meals from the majority of ethnicities making more progress than boys.[56]

121.   The Education Committee highlighted how White British pupils underperform when compared their peers in other ethnic groups. Their research indicated that the White British category gave the lowest attainment score for a free school meal eligible ethnic group, other than the Gypsy/Roma and Irish Traveller categories. The report also flagged that the proportion of White British pupils who were eligible for free school meals starting higher education by the age of 19 was the lowest of any ethnic group, other than the Gypsy/Roma and Irish Traveller categories.[57] The report considers a number of contributing factors, including persistent and multigenerational disadvantage, regional economics, a disengagement from the curriculum and a failure to address low participation in higher education. One of the solutions offered by the inquiry is to emphasise the value of vocational training and apprenticeship options. However, the SMC report affirms that apprenticeship options are only a remedy if offered at the right level.

122.   **Mitigation:** Forces are encouraged to develop outreach initiatives that connect with as wide an audience as possible, and to be proactive in seeking out new opportunities. Retention and progression should be monitored, with

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56 Ibid
57 Education Committee. (2021). 'The forgotten: how White working-class pupils have been let down, and how to change it' [internet]. Available from publications.parliament.uk/pa/cm5802/cmselect/cmeduc/85/8502.htm [Accessed August 2021]

recruits provided with appropriate support mechanisms to help them achieve their potential. This also applies to the protected characteristics.

123. Eligibility to become a PCSO is controlled by forces. Forces may wish to consider the possibility of socioeconomic background and its influence on education outcomes when considering PCSO entry requirements.

124. While socioeconomic data is not data that forces routinely collect, we will support any initiatives to facilitate data analysis so that any potential impact may be identified and mitigated for.

125. **Key PSED objective(s) considered:** Advance equality of opportunity**.**

Conclusion

126. Currently, with the limited availability of national workforce data, it has not been possible to form firm conclusions on what impact the new routes are having on recruitment demographic. This understanding will emerge with ongoing data collection and analysis.

127. We know, from various data collection exercises conducted for PEQF entry routes, that data aggregation and subsequent analysis is limited by the lack of diversity data standardisation. This has partly been remedied by issue of a standardised diversity code. An additional challenge was posed by the repeat requests from various agencies to forces for workforce data. Both standardisation and streamlining the data return process are resolved via our use of the Home Office Police Workforce Census for future data analysis. The 2019/20 census did not feature data against the PCSO programmes. Mandatory completion of entry routes in the census alongside more forces implementing the programme will provide more data for further analysis.

128. Forces are encouraged to monitor workforce demographic when introducing any workforce initiative to help them meet their equality duty. Understanding the impact of any new initiative on workforce diversity is key to ensuring that we secure a representative workforce. A workforce that is representative of the communities that policing serves is a key priority for the police service. We understand that any new PCSO entry route should not compromise diversity and should continue to promote equality of opportunity. We are working to

help forces ensure that fairness, diversity and inclusion are integral to police recruitment.

129. We are committed to an ongoing review of equality impact. If you have any useful information that may help to support this EIA, please contact us at **PolicingEQF@college.pnn.police.uk**

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wales-31-march-2021/police-workforce-england-and-wales-31-march-2021#diversity [Accessed September 2021]

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Appendix 1: Initial EIA key points

Protected characteristic	Potential Impact				Evidence of impact and, if applicable, justification where a genuine determining reason seems to exist
	Unknown	Neutral	Negative	Positive	
Age	X				Forces are encouraged to ensure learning provision is accessible to officers of all ages. Recruitment and progression data to be monitored.
Disability		X			Forces to pay regard to whether officers with a disability are impacted by the new routes, including those with 'hidden disabilities'. Reasonable adjustments must be provided as per the EqA. Recruitment and progression data to be monitored.
Gender reassignment	X				We welcome any data, research or other evidence of the potential impact of the new routes on trans people. Forces may wish to review policies to ensure that they accommodate the needs of trans people.

Protected characteristic	Potential Impact				Evidence of impact and, if applicable, justification where a genuine determining reason seems to exist
	Unknown	Neutral	Negative	Positive	
Marriage and civil partnership	X				We welcome any data, research or other evidence of the potential impact of the new routes on marriage or civil partnerships.
Pregnancy and maternity	X				We welcome any data, research or other evidence of the potential impact of the new entry routes on pregnancy or maternity. Forces must accommodate any request to pause learning for maternity leave absences.
Race	X				Forces will be encouraged to collect and analyse data relating to the demographic of their PCSO workforce. This data will help to inform an understanding of participation, progression, identify limitations and support equality. Forces should be mindful of the year on year decrease in the number of PCSOs who identify as Black, Asian and Minority Ethnic.

Protected characteristic	Potential Impact				Evidence of impact and, if applicable, justification where a genuine determining reason seems to exist
	Unknown	Neutral	Negative	Positive	
Religion and belief		X			The new routes should not create any obstacle to religious observance. Forces are encouraged to collect data on this protected characteristic as part of their EIA.
Sex		X			We will monitor the data closely to understand the impact of the new routes on female representation. Female PCSO representation has always been high compared to police officers. Forces are encouraged to be attentive to any change to this trend.
Sexual orientation	X				We welcome any data, research or other evidence of the potential impact of the new programme on people who identify as LGBT+.
Socioeconomic status	X				We welcome any data and research on the significance of socioeconomic background of the PCSO workforce demographic, and how this may be affected by the introduction of the new programme.

Appendix 2: Examples of emerging practice and further ideas

As part of the quality assurance process, forces are requested to submit force-specific EIAs for PEQF police constable entry route implementation. The service's commitment to developing a representative workforce has led to a strong level of engagement with the EIA process, with all protected characteristics given due consideration and true innovation emerging. Below are examples of emerging practice taken from these EIAs. To support forces, examples have also been included to help forces get creative, which are drawn from broader research surrounding engagement initiatives. Initial findings suggest that in many cases, forces and higher education institutions (HEIs) intend to adopt similar approaches to widen participation and address any issues that may arise. They also show that the methods used can apply across a range of protected groups. While the findings relate to the police constable entry routes, there may be points of interest for forces introducing the new PCSO entry routes.

Practice	Examples
Outreach and engagement	
Specific information, advice or guidance tailored for protected groups.	- HEIs host events for potential students and give information about the university, courses and support available. - Officers attend HEI and careers fairs, and promote the service as an inclusive employer. - Add key points from workforce policies, such as gender reassignment, annual leave for pilgrimage, accommodations for parenting and caring responsibilities.

Practice	Examples
	▪ 'Meet and greet' sessions where potential recruits come and meet serving officers. ▪ Set up PEQF Q&A areas on the force website. ▪ Set up a dedicated email for queries relating to recruitment via PEQF.
Promotional resources promoting diversity.	▪ Tailored marketing, such as providing materials that provide information on the gender and ethnic balance. ▪ Video blogs about the experience of minority group officers and new officers on YouTube and the force's website. ▪ Research into effective use of social media streams. ▪ Videos featuring individuals from protected groups and the workforce's commitment to diversity.
Engaging local community groups, religious and community leaders, schools and colleges.	▪ Attendance and presentations at community festivals and events. ▪ Use of local radio and other media streams. ▪ Work with schools and 'feeder' colleges. ▪ Get input from independent advisory groups made up of key community members.

Practice	Examples
Applying for equality, diversity and inclusion kite marks, charters, etc.	• Membership of specific groups, such as Advance HE's Athena Swan Charter, Stonewall list of organisations.
Engage staff associations	• Obtain ideas for outreach and connection.
Recruitment and selection	
Introduce 'blind' recruitment.	• During the paper sift, remove information visible to the recruitment panel that may associate a candidate with a protected characteristic.
Flexible entry requirements taking account of individual skills, expertise and experience.	• Most HEIs consider experience and skills where candidates do not hold the required academic qualifications for entry.
Sign up to the Disability Confident scheme and ensure recruitment process is inclusive.	• Review recruitment processes to ensure fairness. • Ensure that info regarding the reasonable adjustment application for support with the application and recruitment process is available on the force website, or made available very early in the process. • Put mechanisms in place to ensure that reasonable adjustments can be made to support an applicant through the application, and that the recruitment process is fair and consistent.

Practice	Examples
Review application and recruitment processes.	- Ensure all parts of the recruitment are inclusive and do not create obstacles for someone with a protected characteristic. For example, reviewing the questions in a written assessment for minority group stereotypes, following neurodiversity style guides. - Ensure all those involved in recruitment have received training in equality and inclusion, and have been given time to reflect on this training. Not giving individuals the time to reflect on unconscious bias training may lead to unconscious bias.
Retention, attrition and progression	
Buddying and mentoring schemes for protected groups and individuals.	- Student buddies for students with disabilities. - Reverse mentoring schemes.
Part-time courses and blended learning.	- Provision of a part-time offer will give access to those who cannot commit to full-time study or work, such as individuals with caring responsibilities. - Working with HEIs to develop a range of different training delivery methods to accommodate those with care responsibilities, for example, online modular learning.

Practice	Examples
Ensure curriculum design and pedagogy is inclusive.	▪ Working with HEIs to ensure that all learning content is inclusive. This can include adjusting content for learning difference and ensuring content does not stereotype or ostracise minority groups.
Dedicated staff roles offering personal support.	▪ Having lead staff for specific characteristics (such as disability and race), personal tutors, advisers, mentors, coaches and buddies. ▪ Share contact emails with any new recruit from a minority group to a 'support network' comprised of diversity ally and force DEI practitioners.
Engage staff associations.	▪ Establish additional support mechanisms for recruits. ▪ Signpost new recruits to all available networks.
Regular data collection, monitoring and analysis.	▪ Collect student feedback through satisfaction surveys, focus groups and student forums. ▪ Encourage the workforce to understand that full and candid declaration will help their force achieve the objectives of Policing Vision 2025, and will ensure that initiatives can be put in place to secure a fair and inclusive workplace for everyone. ▪ Monitor progress and catch any problems early.

Practice	Examples
Review existing policies and introduce new policies.	▪ Ensure that existing policies are fit for purpose and introduce the mechanics for ensuring that all prohibited behaviours under the Equality Act are eliminated. ▪ Introduce policies that will build an inclusive and fair workplace.
Encourage aspiration.	▪ One-to-one career support discussions. ▪ Encourage specialist teams to offer 'experience days' and lead on talks about their function.

Appendix 3: Diversity data collection – January 2020

Consolidated data returns provided in March 2020 from the three implementing forces. See relevant section above for further information about this data collection exercise.

NB:

- For figures pertaining to recruited PCSOs, data was returned from all three forces. For data relating to PCSOs who weren't recruited, data was only returned from two forces.

- Some tables will include a row tabled 'differential'. The differential is equal to the difference between the expected total and the figures returned against the protected characteristic subsets. This is probably where individuals did not return any information against the protected characteristic. However, two of the forces did not return non-disclosure data to us. We will ensure that the data collection template is modified for future data collection exercises to encourage forces to formally record non-disclosure figures. Where the table features a row labelled 'not disclosed', these are figures from the one force that had returned non-disclosure data.

- Percentages for total recruited or not recruited cannot be truly representative due to the existence of a differential value but have been included as highest and lowest figures may help us to understand some general trends.

- Lower figures have been redacted in accordance with data protection legislation. We owe a duty of care to data subjects and need to take the necessary precautions to protect a person's right to privacy. Where figures are so low as to create the risk of a person being identified, these figures have been redacted. Where possible '<5' has been used to allow some disclosure but without compromising the right to privacy.

Age

Consolidated data returned from the two forces that used the age sub-sets provided in the College data collection template:

	Total recruited	Subset representation (%)
18-30	58	87
31-45	7	10
46-55	<5[58]	<3
56 and over	0	0
Prefer not to say	<5	<3
Differential[59]	<5	<3
Total	70	100

Data returned from the force that used their own age sub-sets:[60]

	Total recruited	Subset representation (%)
16-24	39	42
25-34	33	35
35-44	9	10

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[58] Lower figures redacted in accordance with data protection legislation. See above.

[59] The differential is equal to the difference between the expected total and figures returned against the protected characteristic subsets. This is probably where individuals did not return any information against the protected characteristic however two of the forces did not return non-disclosure data to us. We will ensure that the data collection template is modified for future data collection exercises to encourage forces to formally record non-disclosure figures.

[60] Due to the existence of a differential, tables provided under each protected characteristic with information regarding those recruited and not recruited will not produce the same cumulative totals.

	Total recruited	Subset representation (%)
45 and over[61]	12	13
Prefer not to say	0	0
Not disclosed	0	0
Total	93	100

Disability

	Total recruited[62]	Subset representation (%)
Disabled	5	3
Not disabled	155	95
Prefer not to say	<5	<2
Not disclosed	<5	<2
Total	163	100

The data below applies to the two forces that returned figures against applicants not recruited.

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[61] Subsets combined to allow for limited disclosure.
[62] Total recruited in this table and all subsequent tables are figures consolidated from all 3 forces.

		Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Disabled	5	<5	-	-
Not disabled	127	109	53.8	46.2
Prefer not to say	<5	0	100.0	0.0
Not disclosed	<5	356	-	-

Gender reassignment

	Total recruited	Subset representation (%)
Yes	0	0
No	138	85
Prefer not to say or not disclosed[63]	2	1
Differential	23	14
Total	163	100

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[63] Subsets combined to allow for disclosure.

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Yes	0	<5	0.0	100.0
No	110	871	11.2	88.8
Prefer not to say	0	8	0.0	100.0
Not disclosed	<5	<5	-	-

Marriage and civil partnership

One force had merged the marriage and civil partnership subsets. However as the two forces that used the College template subsets had nil returns for these data sets, there is no need to present the figures separately.

	Total recruited	Subset representation (%)
Married or civil partnered	14	17
Not married or civil partnered	71	44
Prefer not to say	6	4
Not disclosed	43	26

	Total recruited	Subset representation (%)
Differential	29	9
Total	163	100

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Married or civil partnered	14	166[64]	7.8	92.2
Not married or civil partnered	36	709	4.8	95.2
Prefer not to say	0	12	0.0	100.0
Not disclosed	43	<5	-	-

[64] Figures combined for the force that had not submitted data in this format.

Pregnancy and maternity

Two out of three forces returned data against this protected characteristic.

	Total recruited
Currently on adoption/maternity/paternity leave	0
Not currently on adoption/maternity/paternity leave	121
Prefer not to say	0
Not disclosed	0
Total	121

Race

	Total recruited	Subset representation (%)
Asian – Bangladeshi	0	0
Asian – Chinese	0	0
Asian – Indian	<5	<5
Asian – Pakistani	<5	<5
Asian – Any other Asian background	<5	<5

	Total recruited	Subset representation (%)
Black – African	<5	<5
Black – Caribbean	0	0
Black – Any other Black/ African/Caribbean background	0	0
Mixed – White and Black Caribbean	0	0
Mixed – White and Asian	<5	<5
Mixed – White and Black African	<5	<5
Mixed – Any other Mixed/multiple ethnic background	0	0
Other – Any other ethnic group	0	0
Other – Arab	0	0
White – English/Welsh/ Scottish/Northern Irish/ British	130	80
White – Gypsy or Irish Traveller	0	0

	Total recruited	Subset representation (%)
White – Irish or White – Any other White background[65]	11	7
Prefer not to say or Not disclosed[66]	14	9
Total	163	100

To allow for disclosure, the figures can be consolidated as follows:

	Total recruited	Subset representation (%)
Combined ethnic minority or Black, Asian and minority ethnic subsets[67]	8	5
Combined White subsets	141	87
Prefer not to say or not disclosed	14	9
Total	163	100

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[65] Subsets merged to allow for disclosure
[66] Ibid
[67] Excluding White minority groups as per Home Office protocol, see footnote 24

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Asian – Bangladeshi	0	12	0.0	100.0
Asian – Chinese	0	0	0.0	0.0
Asian – Indian	<5	14	-	-
Asian – Pakistani	<5	47	-	-
Asian – Any other Asian background	0	11	0.0	100.0
Black – African	<5	6	-	-
Black – Caribbean	0	7	0.0	100.0
Black – Any other Black/ African/ Caribbean background	0	<5	0.0	100.0
Mixed – White and Black Caribbean	0	9	0.0	100.0

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Mixed – White and Asian	<5	6	-	-
Mixed – White and Black African	<5	<5	-	-
Mixed – Any other Mixed/ multiple ethnic background	0	9	0	100.0
Other – Any other ethnic group	0	<5	0	100.0
Other – Arab	0	<5	0	100.0
White – English/ Welsh/Scottish/ Northern Irish/ British	117	817	12.5	87.5
White – Gypsy or Irish Traveller	0	<5	0.0	100.0
White – Irish	<5	<5	-	-
White – Any other White background	8	89	8.2	91.8

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Prefer not to say	0	5	0.0	100.0

Religion

	Total recruited	Subset representation (%)
No religion	85	52
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	42	26
Buddhist	0	0
Hindu	0	0
Jewish	0	0
Muslim	<5	<5
Sikh	<5	<5
Any other religion	<5	<5
Prefer not to say	28	17
Not disclosed	<5	<5
Total	163	100

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
No religion	85	581	12.8	87.2
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	41	279	12.8	87.2
Buddhist	0	<5	0.0	100.0
Hindu	0	<5	0.0	100.0
Jewish	0	<5	0.0	100.0
Muslim	<5	62	-	-
Sikh	<5	6	-	-
Any other religion	<5	70	-	-
Prefer not to say	<5	39	-	-

Sex

	Total recruited	Subset representation (%)
Intersex	<5	<3
Female	71	44
Male	87	53
Other	<5	<3
Prefer not to say	0	0
Not disclosed	<5	<3
Total	163	100

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Intersex	<5	34	-	-
Female	62	453	12.0	88.0
Male	68	549	11.0	89.0
Other	<5	9	-	-
Prefer not to say	0	<5	0.0	100.0

Sexual orientation

	Total recruited	Subset representation (%)
Bisexual	<5	<3
Gay/lesbian	6	4
Heterosexual	127	78
Prefer to self-describe	0	0
Prefer not to say	25	15
Not disclosed	<5	<3
Total	163	100

The data below applies to the two forces that returned figures against applicants not recruited.

	Total recruited	Total not recruited	Percentage of applicants recruited (%)	Percentage of applicants not recruited (%)
Bisexual	<5	46	-	-
Gay/lesbian	5	47	9.6	90.4
Heterosexual	125	918	12.0	88.0
Prefer to self-describe	0	<5	0.0	100.0
Prefer not to say	<5	34	-	-

About the College

We're the professional body for the police service in England and Wales.

Working together with everyone in policing, we share the skills and knowledge officers and staff need to prevent crime and keep people safe.

We set the standards in policing to build and preserve public trust and we help those in policing develop the expertise needed to meet the demands of today and prepare for the challenges of the future.

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