

Equality impact assessment

PEQF PC entry routes

Version control

Version number	Date	Comments
1.0	30/05/2022	Concise PEQF PC entry routes EIA v16

Overview

Name of product under development or review	Policing Education Qualifications Framework (PEQF) PC entry routes
Description of the product	<p>PEQF entry routes have been brought in to help professionalise policing and ensure consistent standards. For police constables (PCs), there are three routes.</p> <p>Police Constable Degree Apprenticeship (PCDA)</p> <p>A degree-level apprenticeship, enabling new recruits to join the police service as an apprentice PC. Students will complete a Degree in Professional Policing Practice during their three-year programme.</p> <p>Degree-Holder Entry Programme (DHEP)</p> <p>An entry route into the police service for degree-holders whose first degree is not in professional policing. It operates as a graduate entry programme or conversion programme to the profession of policing. Recruits undertake a two-year practice-based level 6 Graduate</p>

	<p>Diploma in Professional Policing Practice. Some forces offer a specific detective pathway.</p> <p>Degree in Professional Policing (PPD)</p> <p>A knowledge-based degree, which can be delivered as either a standard three-year degree programme or a two-year accelerated programme. It is achieved prior to recruitment to the police service. It is run by a higher education institution (HEI) and the student has no guarantee of recruitment into the police service.</p>
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Identified impacts and mitigations

Age

PCDA

1.1	There is a common misconception that apprenticeships are only for younger people. This may discourage those from older age groups from applying for the PCDA.
	Forces are encouraged to closely monitor the age profile of their new recruits. We will work with forces to monitor this data and consider mitigations if there are any obstacles for older applicants. National apprenticeship data suggests that increasing numbers of older people are accessing apprenticeships as a career change.
1.2	Forces have raised concerns that the current minimum age restrictions could mean potential candidates are lost, as other employers may have already made their selections from the recruitment pool.
	We have worked with the Home Office and consulted with stakeholders to amend Regulation 10 of the Police Regulations 2003. The amendment allows forces to accept applications from those under the age of 18, so long as the candidate will be 18 at the time of appointment. This will help to ensure that the PCDA can compete with other career options for school leavers.
1.3	A lower wage may primarily be attractive to applicants with fewer financial responsibilities, many of whom are likely to be younger. However, it may be the

	case that the opportunity to earn while learning and achieve a level 6 qualification could also be an attractive option for those with more financial responsibilities, who are likely to be older.
	The Home Secretary has accepted the recommendations of the NPCC to set the PCDA starting salary between £18,000 and pay point 1 (£23,586), followed by annual pay increments. This is to allow individual forces to decide the amount that is appropriate to the force area, based on local financial, workforce and job market considerations.
1.4	Some forces have expressed concern that older applicants may be less likely to hold a level 3 qualification – a potential HEI entry requirement – and may therefore be excluded from applying.
	The EIAs we have received from forces as part of the quality assurance process confirm that many forces are working with their partner HEIs to develop a framework of equivalence, which will allow other qualifications or work experience to contribute to entry requirements.

PPD

-	See 1.3, 1.4
1.5	Those with financial commitments may not be able to afford to study for a degree and may not see the PPD as a viable option. This may be true for many older candidates.
	<p>Prospective students may be able to access student loans and maintenance grants via the Student Loans Company. HEIs use a range of initiatives to engage older students. The HEI may also offer additional financial support through bursary or scholarship schemes. Each HEI has student support teams who can offer advice and financial guidance.</p> <p>For potential candidates with financial commitments who are concerned about the costs associated with higher education, the two-year accelerated programme may be particularly appealing.</p>

1.6	The majority of students starting an undergraduate degree are under the age of 20. A younger age profile is therefore likely to be reflected in the PPD recruitment age demographic.
	Forces are encouraged to monitor recruitment age. If recruitment figures indicate a disproportionately low number of entrants from a particular age group, mitigations can be considered to redress balance. These mitigations could include further research into possible causes, as well as targeted marketing and outreach.

DHEP

-	See 1.3, 1.4
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General

1.7	Individuals who have caring and/or familial responsibilities, many of whom will be aged 25 and above, may view joining the police service and undertaking additional study as too great a burden on their time and care commitments.
	Many HEIs have support in place for such students, including flexible learning arrangements or childcare facilities. Forces are encouraged to seek relevant information from HEIs and to understand how they are supporting mature students. Forces may wish to explore providing part-time options.
1.8	Some candidates may feel that they will be unable to meet the demands of a level 6 programme.
	<p>Many HEIs have extensive experience in inclusive practices for mature students. These can include advice services, mentoring, peer support and study skills sessions. These practices are highlighted in our reviews of HEI and force EIAs.</p> <p>There is a wealth of research exploring the motivators for an individual's return to education after an extended period away, as well as the impact of this on enrolment, retention and attainment.</p>

Disability (including neurodiversity)

PPD

2.1	Concerns have been raised that where HEIs offer the accelerated PPD, some prospective applicants who have a disability may not feel that they will be able to cope with the intensity of the degree.
	National data suggests minimal difference between the proportion of those with disabilities between standard and accelerated degrees. Accelerated PPD options are vastly outnumbered by standard PPD offerings.
2.2	Disabled Students Allowance (DSA) is an annual allowance and is unaffected by the duration of the taught academic year. Students on accelerated programmes that are taught over an extended academic year may therefore experience difficulties accessing continuous disability support.
	All HEIs will have student support facilities and many have teams whose specific function is to support students with a disability. Guidance and advice on applying for the DSA and its use will be given. Some HEIs will have provisions for grant applications where additional funding is required. Any HEI wishing to introduce an accelerated degree is encouraged to meet with student support teams to ensure that mechanisms are in place to support accelerated degree students with a disability.

General

2.3	There are certain disabilities that are likely to preclude someone from becoming a PC. These are linked to the health and fitness requirements of operational policing, which have not changed with the introduction of the new entry routes. Further information about these requirements can be found in Regulation 10 of the Police Regulations 2003.
	Fitness standards are periodically reviewed to ensure that they reflect the needs of modern policing.
2.4	Some parties have raised concerns that neurodiverse students may be more likely to find level 6 learning more challenging.

	<p>We have not been able to find any significant research into neurodiversity and degree attainment. Research in this field is constantly expanding and we will monitor new literature, which may shed more light on this area. HEIs have dedicated disability support teams, as well as a range of accessible resources and widening participation programmes. Support mechanisms can include tailored inductions, one-to-one guidance appointments with a disability advisor and assistance with DSA applications. Working in partnership with HEIs to deliver the PCDA and DHEP may give forces access to a broader range of support for new recruits than would otherwise be available to them. Most forces have disability and/or neurodiversity staff networks, which can offer peer support.</p> <p>The College is a member of policing's national neurodiversity and workplace adjustments working groups. These groups will consider recruitment, progression and retention of neurodiverse officers and staff. National policing data around disability is poor due to low characteristic data completion rates. Campaigns have been launched in a drive to improve the disclosure of protected characteristics.</p>
2.5	<p>The National Institute of Health and Care Excellence (NICE) and others point to evidence of increasing levels of reported mental health issues for students in higher education.</p>
	<p>Many HEIs will offer mental health support facilities, such as counselling, and may have specific policies on student care and mental health. 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 present policing and the new pathways as an appealing career option.</p>

Gender reassignment

PCDA

3.1	There is currently very little data that can be used to undertake an equality impact assessment, as employee sharing of this characteristic nationally is currently low. National research by the Government Equalities Office found that over half of trans and non-binary respondents had hidden the fact that they are trans for fear of discrimination.
	Campaigns have been launched nationally in a drive to improve the completion rates of characteristics, with a focus on why data completion is important and how the data is used. This will allow us to develop a better understanding of any disproportionality experienced by transgender officers.

Marriage and civil partnership

General

4.1	There is no information at present to suggest any direct impact on people who are married or in a civil partnership. If there is a disproportionate number of recruits from younger age groups, there may also be a reduction in the number of recruits who are married or in civil partnerships.
	We will work with forces to monitor the data and consider mitigations if any obstacles for this protected characteristic are identified.

Pregnancy and maternity

PCDA

5.1	Forces have questioned whether the PCDA three-year probationary period may have the effect of deterring or disadvantaging those who become, or plan to become, pregnant.
	As they are fully sworn officers from day one, recruits are covered by Regulation 33 of the Police Regulations 2003, which outlines the conditions under which officers

	are granted leave. This includes maternity, parental and adoption leave. Forces may also have peer support available to expectant and new parents through staff networks.
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PPD

5.2	Parents in receipt of Parents' Learning Allowance may be affected because it is an annual allowance that is unaffected by the duration of the taught academic year.
	<p>Many HEIs will have provisions for grant applications where students have budget shortfalls. Childcare facilities may be available on site and/or at discounted rates. HEIs will have student support services that can advise students who are struggling financially.</p> <p>There is some recourse for additional funding if the student pays for childcare, has an adult who is financially dependent on them, has a disability or learning difference, or is under 25 and supports themselves.</p>

Race or ethnicity

PCDA

6.1	The new entry routes present an opportunity to deliver the recommendation in 'The Macpherson Report: Twenty-two years on' that police training involves 'an explicit focus on anti-racism which should including examining racial disparities and seeking to reduce differences in experience and outcomes by racial and ethnic group'.
	Subject matter experts in the diversity, equality and inclusion (DEI) teams were consulted on the PEQF curriculum to ensure that it adequately addresses anti-racism, bias, prejudice, discrimination and other core issues relating to DEI training. DEI matters are revised or added to, as appropriate, with each curriculum update to ensure the curriculum reflects new learning.

PPD

6.2	Evidence indicates a correlation between ethnicity and degree outcomes. A study has indicated that students from ethnic minority backgrounds were less likely to obtain a first or 2:1 degree outcome, with an attainment gap of 13%.
	Forces are encouraged to establish whether their partner HEI monitors attainment gaps. If a gap is evident, enquiries should be made about what mitigating actions are being taken. Forces should collaborate with HEIs to ensure that factors pertaining to curriculum provision, such as learning styles and assessment method, are inclusive and limit the probability of an attainment gap.
6.3	HEIs continue to make great strides in attracting ethnic minority students. Many use targeted approaches to promote access to higher education, especially among local communities where higher education is not the norm. The higher education sector has seen year-on-year increases in participation by those from ethnic minority groups.
	N/A
6.4	An Equality and Human Rights Commission (EHRC) inquiry confirmed that marginalisation and exclusion is still a significant issue in the higher education sector. Students reported isolation and loss of confidence, as well as struggling with mental health and wellbeing.
	HEIs are encouraged to be mindful of these observations and monitor student retention accordingly. All HEIs should have clear, zero-tolerance approaches to bullying, harassment and other similar behaviours, with clear reporting mechanisms in line with the EHRC report recommendations. We will monitor this via our review of HEI EIAs.

General

6.5	Although progress has been made in ethnic minority representation among the police workforce, there is still much to do to demonstrate policing's commitment to treating ethnic minority communities fairly. To quote 'The Macpherson Report: Twenty-two years on', 'individuals from BME [Black and minority ethnic]
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	communities are deterred from joining the police by deeply entrenched and historic negative perceptions of police and policing’.
	Police leaders have committed to a comprehensive review of inclusion in the service. The Police Race Action Plan will aim to address longstanding challenges in the relationship between policing, its Black workforce and Black communities. The project will be a collaborative initiative led by the National Police Chiefs’ Council, with partners from across policing, including the College, staff associations, and police and crime commissioners.
6.6	Localised research has shown that the percentage of ethnic minority respondents who would consider a career in policing increased after reviewing details on the PCDA and DHEP. This suggests that the offer of a variety of professional entry routes into policing could see a greater reach into communities than before.
	N/A
6.7	Some partners have raised concerns that the requirement for candidates to have a level 3 qualification to be eligible to apply to the programmes may present a barrier for Black – and especially Black Caribbean – candidates, who experience poorer outcomes compared to both White British and Asian peers.
	<p>The level 3 entry requirement pre-dates the introduction of the PEQF and is formalised in police regulations. Regulation 10 (Annex BA) (c) provides for ‘training or work experience [...] which is considered by the chief officer to be equivalent to a level 3 qualification’.</p> <p>Between 2006 and 2020, Black pupils had the greatest increase in higher education entry rate out of all ethnic groups. Forces and HEIs should work together to monitor disparity in intake and outcomes, and where possible should use the ‘18+1’ format so that disparity within groupings of ‘Black’ and ‘Asian’ are identified.</p>
6.8	A Business in the Community study showed that career progression is reported as being of more importance by Black employees than White employees. This was accompanied by low confidence in the fairness of their employers’ progression processes.
	It is recommended that forces undertake workforce data monitoring to understand if there is disproportionality in progression. To raise awareness of potential

	professional pathways, we have produced role profiles. These are accompanied by career pathway profiles and guidance.
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Religion or belief

PCDA

7.1	Student loans are not currently compliant with Sharia law. This could mean that the PCDA may be an appealing option for Muslim students, as it provides an opportunity to obtain a degree qualification without the need to take a student loan.
	N/A

PPD

7.2	Student loans are not currently compliant with Sharia law. The government has been seeking to develop a compliant loan system, but this has not yet been done.
	Higher Education Statistics Agency (HESA) data suggests that the absence of a compliant funding system has not been a significant deterrent to Muslim participation in higher education.

General

7.3	Applicants who follow a religion may fear that the demands of police duties could affect their ability to conduct religious observance.
	To promote inclusion, forces can issue guidance on important points from relevant policies, such as prayer facilities, wearing of religious items, and leave for religious holidays or pilgrimage. Positive messages about the force's awareness and ability to accommodate individuals with religious requirements can be integrated into key marketing messages and reasserted at outreach events. 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. We are currently working

	with the Jewish Police Association on guidance on how forces can better support Jewish officers and staff.
7.4	Religion is not currently analysed as part of the annual Home Office workforce data collection return.
	As of 2021, religion is now captured as part of the annual police workforce census (this is distinct to the annual data return). The disclosure rate in 2021 was relatively low, making accurate analysis difficult. Campaigns have been launched nationally in a drive to improve the disclosure of characteristics, with a focus on why disclosure is important and how the data is used. This will hopefully improve data quality for subsequent years.

Sex

PCDA

8.1	There has been a relatively even balance of females and males undertaking apprenticeships for the past decade, with females tending to account for just over half of students. This may help forces redress gender imbalance.
	It should be noted that significant increases in female new recruits could have the effect of temporarily causing an increase in the gender pay gap.

DHEP

8.2	Over recent years, women have accounted for over half of undergraduate degree enrolments. Higher numbers of female graduates may help forces redress gender imbalance.
	It should be noted that significant increases in female recruits could have the effect of temporarily causing an increase in the gender pay gap.

General

8.3	Women are disproportionately likely to have childcare responsibilities. Concerns about managing these alongside study may deter some women from routes that have significant study components.
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	<p>Many HEIs have experience in supporting student parents and may provide childcare support for pre-school-aged children. An increasing number of forces have parenting networks that provide peer support to people balancing parenting and work. The increase in digital and flexible learning arising from the COVID-19 pandemic may provide more opportunities for students and student officers to maintain a good work-life balance.</p>
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Sexual orientation

PCDA

9.1	<p>There is no information at present to suggest any direct impact on people who are LGBTQ+. Studies show that younger people are more likely to identify as LGBTQ+. If PEQF cohorts skew younger than the Initial Police Learning and Development Programme (IPLDP), there may be an associated increase in the proportion of LGBTQ+ officers.</p>
	N/A

Other characteristics

Socio-economic background

General

10.1	<p>Studies show that people from economically disadvantaged backgrounds perform less well at school and are less likely to attend university compared to their more affluent peers growing up in the same area. This may factor into the socioeconomic demographic of those applying for the DHEP or DPP programmes and, to a lesser extent, the PCDA. Further reports have shown that the COVID-19 pandemic may have had a negative impact on measures of social mobility.</p>
	<p>Evidence indicates widening participation in higher education, with year-on-year increases in the number of enrolments from state-funded schools or colleges and those from economically disadvantaged backgrounds. Forces are encouraged to develop outreach initiatives that connect with as wide an audience as possible, and</p>

to be proactive in seeking out new opportunities. To encourage widening access for those who may not have previously considered a career in policing, a widening access programme specification has been developed.

References

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