



POLICE RACE ACTION PLAN:
INDEPENDENT SCRUTINY & OVERSIGHT BOARD

ANNUAL FEEDBACK REPORT

MAY 2024 - MAY 2025

TABLE OF CONTENTS

| | | | |
|----------------------------------------------------------------------------|----|--------------------------------------------------------------------------------------------|----|
| CHAIR'S FOREWORD | 1 | PART C: WORKSTREAM SPECIFIC FEEDBACK | 40 |
| REFLECTIONS FROM CC SARAH CREW | 3 | WORKSTREAM 1: CULTURE AND WORKFORCE | 41 |
| PART A: EXECUTIVE SUMMARY | 5 | 1. <u>Black History Education</u> | 43 |
| OVERVIEW | 7 | 2. <u>Recruitment and Progression</u> | 43 |
| <u>ACCOUNTABILITY AFTER PRAP: MATURITY MATRIX AND OVERSIGHT PRINCIPLES</u> | 8 | 3. <u>Ethnicity Pay Gap Reporting</u> | 44 |
| <u>OUR CALLS TO ACTION</u> | 9 | 4. <u>Black Workforce Survey</u> | 45 |
| <u>WORKSTREAM OVERVIEWS</u> | 11 | 5. <u>Hate Crimes Against Black Officers</u> | 45 |
| PART B: THE LEGACY OF PRAP | 15 | 6. <u>Misconduct, Discipline, and Vetting</u> | 45 |
| STRUCTURE FOR CHANGE: WHY THE MATURITY MATRIX MATTERS | 16 | 7. <u>Leading Inclusive Teams</u> | 46 |
| <u>What is the Maturity Matrix?</u> | 18 | 8. <u>Access and Support for BPAs and Race Equality Networks</u> | 46 |
| <u>Transparency and Public Access</u> | 20 | WORKSTREAM 2: POWERS AND PROCEDURES | 50 |
| <u>Mitigating bias in reporting and use of the Maturity Matrix</u> | 22 | 1. <u>Public and Personal Safety Training</u> | 52 |
| ANTI-RACISM IN POLICING AFTER PRAP | 23 | 2. <u>Vehicle Stops: More than just Section 163</u> | 52 |
| INTERNAL SCRUTINY AND ACCOUNTABILITY STRUCTURES | 24 | 3. <u>Technology</u> | 53 |
| <u>The role of the Chief Constables' Council</u> | 24 | 4. <u>Stop and Search</u> | 54 |
| <u>The role of the National Black Police Association</u> | 25 | 5. <u>British Transport Police</u> | 56 |
| BUILDING EXTERNAL OVERSIGHT | 26 | 6. <u>The Metropolitan Police</u> | 56 |
| <u>Engaging the more "difficult to reach" and 'Unengageable'</u> | 27 | WORKSTREAM 3: TRUST AND RECONCILIATION | 59 |
| STRENGTHENING FORMAL ACCOUNTABILITY MECHANISMS | 34 | 1. <u>Guidance on Police Transparency and Engagement</u> | 60 |
| <u>Home Office Coordination of PRAP Scrutiny</u> | 34 | 2. <u>Pilot for Restorative Justice and Trauma-Informed Practice</u> | 61 |
| <u>Embedding PRAP accountability into HMICFRS Inspection Frameworks</u> | 36 | 3. <u>Community Engagement Evaluation Workshop</u> | 61 |
| LOCAL AND NATIONAL SCRUTINY IN PRACTICE | 38 | 4. <u>National Community Reference Group</u> | 62 |
| <u>Community engagement at force level</u> | 38 | WORKSTREAM 4: SAFETY AND VICTIMISATION | 64 |
| <u>The role of the National Community Reference Group (NCRG)</u> | 38 | 1. <u>Professional Conversations</u> | 65 |
| | | 2. <u>Adultification</u> | 66 |
| | | 3. <u>Authorised Professional Practice Guidance</u> | 67 |
| | | 4. <u>Data-Driven Approaches to Understanding the Impact of Crime on Black Communities</u> | 67 |
| | | 5. <u>Enhancing Performance Metrics and Accountability</u> | 68 |
| | | ISOB RECOMMENDATIONS OVER THE YEARS | 69 |
| | | GLOSSARY | 71 |
| | | APPENDIX 1 | 77 |

Note:

**Bold and italicised words used throughout the report indicate a glossary term*

CHAIR'S FOREWORD

Beyond the Plan: Building Credibility, Delivering Change



*Chair's Foreword
by Abimbola
Johnson,
Independent
Scrutiny and
Oversight Board*

Over the past four years of the Police Race Action Plan (PRAP), one of the more disheartening patterns has been the sense of déjà vu. Encountering the same individuals, revisiting the same issues, and feeling as though we are constantly restarting the same conversation.

Those who remain engaged often find themselves in rooms with others who share their commitment, but without the levers to drive the systemic change that is needed. Simultaneously, the structure of policing can make it all too easy for others to disengage quietly, to step back from PRAP delivery without facing any real accountability. This creates an uneven landscape of effort – where a committed few shoulder the weight of the work, while others remain on the periphery. The result is that valuable time and energy can be spent expressing frustration and battling through blockers, rather than collectively moving forward.

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“Valuable time and energy can be spent expressing frustration and battling through blockers, rather than collectively moving forward.”

Chairing the ISOB is a role I take seriously and am deeply committed to. Yet it is also a personally wearing one. Much of my time is spent engaging with people, both within policing and across civil society, who are striving to push this work forward. Yet, my role often requires me to challenge them, pointing out where efforts are falling short or where blind spots persist. That dynamic can be difficult. I also often find myself in the awkward position of trying to highlight the context behind PRAP to groups who feel alienated from it. Explaining a program they have not been part of shaping and do not feel connected to. This duality can become isolating. I can feel as though I am not quite providing the service anyone would like me to. However, I continue because I believe that scrutiny, when exercised honestly and constructively, is a vital tool for building something better.

As Chair, I have seen real dedication from many individuals working hard to move this agenda forward. However, I have also seen how difficult it is to shift systems and cultures that were never designed with racial **equity** at their core. It came as no surprise, therefore, to read the Guardian's analysis in May 2025 that only



of the recommendations from major reports commissioned to tackle endemic racism in the UK (not just in policing) over the past 40 years have actually been implemented¹

As we near the conclusion of centrally funded PRAP oversight, our focus has necessarily sharpened. While there has been national progress under PRAP, it remains inconsistent and too often falls short of the scale and speed that communities expect and deserve.

A key challenge now is to ensure meaningful and lasting change. That will involve making sure that future scrutineers move this work forward with meaningful empowerment from central Government and that their membership includes vital subject matter expertise.

We remain concerned by a lack of clarity from the PRAP central team about which police forces are meeting their objectives, and what enables or hinders their success. Despite the team's experience accumulated over the past four years, knowledge has not been systematically captured or shared in ways that reassure us will support a smooth transition beyond March 2026. Both local forces and national leads have raised concerns about a lack of coordination and the absence of practical tools to support continued delivery. At the same time, we do not believe police leadership has pushed PRAP to achieve its potential either through championing it or through constructively and meaningfully scrutinising and challenging PRAP's work.

Communities, both within and beyond policing, are often unclear about PRAP's purpose or progress, and many do not recognise it as a programme developed in genuine partnership with them. Across the sector, expertise is under-used, and critical questions about how PRAP will be structured and supported in the future remain unanswered.

Our conclusion is that the most effective way to drive change is through the tool being developed to measure PRAP delivery across forces: **The Maturity Matrix**. For the first time in policing in England and Wales, there will be an evidence-based tool to assess how effectively forces are embedding anti-racism. This marks a significant step forward, and its potential for transformation should not be overlooked.

Our hope is that this will drive PRAP delivery towards outcomes linked to anti-racism. That it will introduce a level of transparency which will enable meaningful and detailed scrutiny to take place and that, with buy-in from central government and statutory inspection bodies, national **civil society organisation**, local community groups, and statutory accountability and scrutiny bodies, it will have the teeth to push forces to make delivery a priority.

We remain cautiously hopeful. With the right leadership and collaboration, we believe this can still be a turning point. The work ahead is complex, but necessary.

We are grateful to The Runnymede Trust, Just for Kids Law, the **National Black Police Association** and to CC Sarah Crew for providing specific input into this year's report. I am especially grateful to each of my Board members for their continued commitment to this work.

I would particularly like to thank Michelle Stead for her invaluable secretarial support, without which it would not be possible to run the ISOB.

Finally, I thank Viya Nsumbu, whose hours of work, keen eye for detail and shrewd communications expertise have guided the Board over her years with us and through this, her last report with us.

Abimbola Johnson
Chair, Independent Scrutiny & Oversight Board
12 June 2025

¹ Aamna Mohdin, Chris Osuh, and Raphael Boyd, 'Only a third of recommendations to tackle endemic racism in UK implemented', The Guardian, 25 May 2025, <https://www.theguardian.com/uk-news/2025/may/25/only-a-third-of-recommendations-to-tackle-endemic-racism-in-uk-implemented> [accessed 10 June 2025]

REFLECTIONS FROM CC SARAH CREW

“Speaking Plainly, Leading Honestly”



Reflections on Policing, Anti-Racism and Leadership from Chief Constable Sarah Crew

When I stood up in June 2023 and publicly acknowledged that Avon and Somerset Police is institutionally racist, I did so knowing it would be uncomfortable, even painful.

For some, it was too much. For others, not enough. For me, it was the right thing, and the necessary thing to say.

This admission was not about blaming individuals or discrediting the many good people who work in policing. It was about taking responsibility for the systems and structures that, too often, produce unequal outcomes, particularly for Black communities.

I reached this conclusion not in isolation, but through years of listening. Listening to people in our communities who feel over-policed and under-protected. Listening to Black officers and staff navigating environments where they do not always feel safe or supported. Listening to community leaders, faith groups, and families who have carried the burden of mistrust for far too long.

The conversations I had before making the admission were difficult but vital. The conversations since have been no less challenging. Some have welcomed the honesty. Others remain sceptical, and understandably so. Black communities have heard the same discussions since the murder of Stephen Lawrence a quarter of a century ago. Words alone are not enough. Trust has been broken. We must show, not just say, that this time is different.

One of the clearest lessons I have learned is that there is no easy fix. This work requires commitment, persistent effort and urgency. There are no shortcuts. Acknowledging **institutional racism** is only the starting point. What matters is what we do next, and whether our actions match our intentions.

With that in mind, in Avon and Somerset Police, we have committed to meaningful change. We have established two ISOs: One focuses on the PRAP. The other addresses broader concerns of disproportionality across the criminal justice system. These Boards are essential to our accountability. They challenge us, guide us, and ensure our efforts are rooted in lived experience, not institutional convenience.

We must confront data that speaks for itself. For example, in 2024/25, Black people in our area were still over five times more likely to be stopped and searched than their white counterparts. This is not defensible. We have reviewed how these powers are used, placing our efforts in intelligence-led approaches, investing in training and committing to greater transparency, but there is clearly so much more to do to create an equitable system.



Likelihood for Black people in our area to be stopped and searched than their White counterparts in 2024/2025

Accountability must extend to the individuals and teams operating within the system. Where data reveals outliers in **disproportionality** – whether in stop and search, use of force, or other key areas of policing – we are investigating these patterns and acting. This is not about blame, but about ensuring fairness, transparency, and learning at every level.

Transforming the culture within the police workforce is crucial for achieving lasting change and is a central aspect of our anti-racist strategy. Over the past two years, over 2000 officers have participated in our Race Matters training programme. This programme has been designed with experts from outside of policing to transform organisational culture, build trust with racial minority communities, and equip officers with the insight and confidence to lead inclusively.

At a national level, the PRAP has been an important step. A plan will not build trust. Only delivery will.



“We must resist the temptation to confuse activity with impact.”

Community confidence is not earned by what we say in police headquarters. It is built by what people see and feel on the ground, and it is reflected in metrics such as stop and search rates, workforce representation, and overall trust and confidence in the police.

Looking ahead to 2026 and beyond, police forces, including my own, have work to do. I believe we must:

1. Speak plainly and honestly

If we cannot accept the reality of **institutional racism**, we will not move forward. We cannot fix what we refuse to acknowledge.

2. Turn scrutiny into change

Community engagement cannot be symbolic. It must shape decisions and exercise accountability. That means resourcing and responding to scrutiny, not just listening to it.

3. Invest in culture, leadership, and lived experience

Systems are only as fair as the people who shape and operate them.

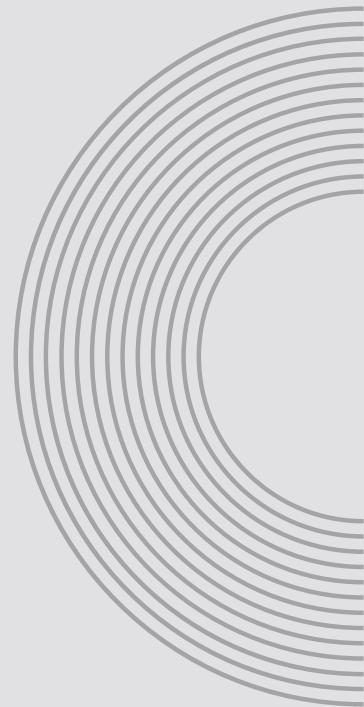
I do not pretend to have all the answers. I am learning as I go. This work is not easy, but it is essential and urgent. It demands humility, persistence, and a willingness to stay in the discomfort. Nevertheless, I am committed because without trust, there is no consent; and without consent, there is no legitimacy to police.

To the ISO: thank you. Your role is essential. Your challenge is welcomed. Your scrutiny will continue to shape how we grow into the anti-racist organisation we aspire to be.

Sarah Crew, Chief Constable, Avon and Somerset Police

PART A

Executive Summary



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01

EXECUTIVE SUMMARY

OVERVIEW

This report is the ISOB's third annual assessment of the Police Race Action Plan, providing an independent review of whether commitments made by policing are leading to tangible change for Black communities.

The PRAP was created to respond to long-standing failures in trust, protection, and fairness.² The credibility of anti-racism in policing depends on whether it delivers real results, not just strategic statements.

Our review finds that some areas are beginning to move in the right direction.

Workstream 2 (Powers and Procedures) has seen new leadership and greater momentum. National reforms to vehicle stop data are long overdue and now finally underway. British Transport Police's improvements to ethnicity data collection offer a practical model for others to follow. Despite these steps, significant concerns remain. Racial disproportionality in the use of stop and search persists. There are still serious data gaps, inconsistent body-worn video (BWV) practices, and scrutiny panels that lack independence or community representation.

Workstream 1 (Culture and Workforce) continues to suffer from stalled activity in critical areas such as race-based hate crimes, misconduct, and vetting. Workstream 3 (Trust and Reconciliation) has delivered national guidance but lacks the practical tools to support local-level change. The creation of the **National Community Reference Group (NCRG)**, alongside renewed engagement with civil society organisations, signals some willingness to open policing up to challenge. Workstream 4 (Safety and Victimisation) remains the least advanced, with limited delivery, poor data, and no visible progress in improving safety for Black communities.

Methodology

This report draws on insight from ISOB's ongoing monitoring of the PRAP, including document review, attendance at national and regional PRAP meetings, and engagement with the Home Office, police forces (including force visits), **civil society organisations**, and community representatives across England and Wales. It reflects evidence gathered between May 2024 and May 2025, supplemented by lived experience, stakeholder feedback, and analysis of publicly available and privately disclosed data.

All findings and recommendations are informed by ISOB's remit to provide independent, constructive scrutiny grounded in transparency, accountability, and anti-racist principles.

ACCOUNTABILITY AFTER PRAP: MATURITY MATRIX AND OVERSIGHT PRINCIPLES

Funding for the central PRAP team ends in March 2026. This creates a sharp deadline for transition. But as it stands, the programme is not ready to be handed over to local forces and national police leads.

The central team has not grown PRAP to a level of maturity where its aims are clearly understood across policing or where forces fully understand what is required of them. The **Maturity Matrix**, policing's first for race and which is meant to serve as PRAP's core accountability tool, remains widely misunderstood both within policing and among external stakeholders. It is not yet operational and cannot currently be used to hold policing to account. **Civil society organisations**, expected to lead future scrutiny, have not been given the tools or guidance needed to do so.

The ISOB is clear: Policing must now build the infrastructure for future delivery. This includes a clear focus on ensuring the **Maturity Matrix** is practical, valued and operational.

To move from intent to impact, the ISOB has identified four priority areas where urgent change is needed.

Data

- The data gap in ethnicity recording for relevant police encounters must be closed to make racial disparities visible and actionable.
- This data must feed into the **Maturity Matrix** which in turn needs to be functional and used as a live tool for tracking anti-racist outcomes – not left as a theoretical framework.

Independent scrutiny

- Independent scrutiny mechanisms must be reformed to include trusted community members (drawn from a wide and representative cross-section) who are empowered to escalate concerns and influence change
- Oversight must include **civil society organisations**; policy, anti-racism, legal and strategic expertise; and be backed by the Home Office to encourage communities' trust and engagement with policing.
- Scrutineers must be supported to use the **Maturity Matrix**, with tailored guidance and clear expectations.

Impact

- Forces must show how their actions are improving outcomes, not just increasing activity.
- Progress must be measured against outcomes that matter to Black communities.
- A lack of compliance and implementation must have meaningful consequences.

Ownership and responsibility

- With central funding ending in March 2026, there is limited time to build a sustainable model for PRAP. The current model has no systemic capability. Forces do not understand or own PRAPs goals.
- National leadership must now focus on building capability and accountability across the system, not just coordinating from the centre.

² National Police Chiefs' Council (NPCC), *Police Race Action Plan: Improving policing for Black people* (June 2022) <https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/race-action-plan/police-race-action-plan-improving-policing-for-black-people.pdf> [accessed 21 May 2025].

OUR CALLS TO ACTION

1. The PRAP Central Team must publish the Maturity Matrix before March 2026

The central PRAP team must publish the **Maturity Matrix** before March 2026 to give forces sufficient time to understand its requirements and prepare for implementation. Alongside this, the team's focus should shift toward coordination by producing practical, public-facing resources that support delivery. These should include training materials and guidance, toolkits tailored for forces of different sizes – including bespoke support for one-person PRAP implementation teams – and strategic planning tools to guide local implementation from March 2026 onwards. These resources must be useful both to the police and the public.

2. The Chiefs' Council must strengthen strategic oversight and plan beyond March 2026

The Chiefs' Council should take a more proactive role in overseeing the central PRAP team's work. This includes agreeing a clear and achievable timetable for delivery, regularly monitoring progress, and engaging directly with **civil society organisations** and experts. It also requires policing leadership to help define what successful PRAP delivery should look like after March 2026 and to set expectations accordingly.

Critically, the Council should assess whether March 2026 remains a realistic endpoint – and, if not, plan now for what will follow.

3. The Home Office must lay the groundwork now for sustainable future delivery

Data gaps are a persistent issue in policing, not just in relation to that which affects PRAP. The Home Office must use its significant power and influence to push policing towards meaningful compliance with data requirements to allow for effective monitoring and scrutiny.

The Home Office should begin preparations now for the possibility of overseeing or funding civil society and expert-led scrutiny after March 2026. This includes holding structured, minuted discussions with **civil society organisations** and experts, and supporting outreach efforts to ensure broad and representative input.

The Home Office must also clearly communicate what it can and cannot support, and to review past models of community scrutiny in order to inform the design of any future mechanisms.



WORKSTREAM OVERVIEWS

A summary of progress, gaps, and priorities across each of the four core areas of the PRAP.

Workstream 1: Culture and Workforce

Where progress is being made

- Black history learning modules developed and rolled out across all forces
- National recruitment framework launched, with a focus on **intersectionality**
- Ethnicity pay gap reporting adopted by some forces, ahead of national legislation
- **Leading Inclusive Teams** pilot introduced to build culture-shifting leadership
- Black Workforce Survey relaunched after delays, capturing lived experience

Where progress is falling short

- No evidence that Black history education is reaching the right audiences or changing behaviour
- Recruitment reforms not embedded consistently or tracked for impact
- Work on misconduct, vetting and race-based hate crimes remains stalled
- Black officer and staff insights remain underused

What needs to happen next

- Resume urgent action on misconduct and race-based hate, with clear leadership accountability
- Move recruitment standards from guidance to delivery with measurable outcomes
- Commission a wider workforce survey to enable meaningful comparison
- Robust and objective evaluation of the **Leading Inclusive Teams** pilot and commit to national rollout if effective
- Embed the policing expertise and lived experience of Black officers across delivery, not just consultation

Workstream 2: Powers and Procedures

Where progress is being made

- Trauma-informed, scenario-based training piloted to reduce use of force
- Ethnicity data collection for vehicle stops underway, with national rollout by 2026
- New BWV guidance introduced, including 30-second pre-record feature
- Closer collaboration between PRAP and national stop and search leadership
- Forces such as British Transport Police closing the ethnicity data gap through targeted action
- **College of Policing** analysis of the Millennium Cohort Study on the impact of being stopped as a teenager has been completed, report anticipated later in 2025.

Where progress is falling short

- Persistent racial disparity in stop and search, with limited signs of improvement
- Live facial recognition technology rolled out without key anti-racism focus
- Scrutiny panels continue to lack independence, transparency, and escalation powers
- Data compliance on BWV and ethnicity recording remains inconsistent
- Engagement by key forces such as the Metropolitan Police remains underdeveloped and lacks reform focus

What needs to happen next

- Embed police power scrutiny mechanisms that are community-led, independent, and transparent – with real power to hold forces to account
- Ensure new technologies are backed by an anti-racist strategy and independent impact reviews
- Track outcomes, not just activity – forces must show how implementation will improve racial **equity**
- Ensure ethnicity data is collected for all vehicle stops and submitted through the **Annual Data Requirement** to enable transparency and action on race disparity
- Close the ethnicity data gap in stop and search across all forces, matching the progress made by British Transport Police
- Prompt publication of evaluative work that has been undertaken e.g. the aforementioned Millennium Cohort Study.

Workstream 3: Trust and Reconciliation

Where progress is being made

- New national guidance on police transparency and engagement developed
- National community engagement workshop delivered to 30 forces
- Case study from South Wales shared as an early example of local innovation
- **NCRG** established to advise PRAP

Where progress is falling short

- Limited activity to support meaningful engagement at force level
- **Restorative justice** pilot delayed, with only one force participating
- **NCRG's** remit misaligned with force-level needs and lacking visibility
- Missed opportunities to involve communities in PRAP learning and delivery

What needs to happen next

- Support forces to translate national guidance into visible local action, especially with young people
- Capture and share lessons from the **restorative justice** pilot to inform future delivery
- Ensure the **restorative justice** pilot is properly conducted and independently evaluated
- Clarify the **NCRG's** remit and invest in more locally focused engagement infrastructure
- Follow up on the national workshop, track implementation, and embed community voices in future sessions

Workstream 4: Safety and Victimisation

Where progress is being made

- **Adultification** evidence review completed, marking a step toward addressing bias against Black children
- Mentoring scheme piloted to strengthen understanding between policing and Black leadership
- Light-touch updates made to **Authorised Professional Practice (APP)** guidance on areas including hate crime and mental health

Where progress is falling short

- Low engagement with the Professional Conversations which is now unlikely to roll out nationally
- **APP** guidance updates lacked depth and failed to drive meaningful change
- Ethnicity data remains incomplete and inconsistent across forces. The data gap for work relating to this workstream alone sits at around 40.4%
- No metrics in place to track whether safety and protection outcomes are improving
- Limited operational delivery at force level

What needs to happen next

- Embed findings from the **adultification** review into training, operational policies, and frontline guidance in consultation with groups with subject matter expertise
- Develop a clear national plan to increase police understanding of **adultification** in practice
- Undertake the original commitment to data-driven insight into how crime impacts Black communities
- Establish national standards and incentives for complete ethnicity data collection
- Embed clear performance metrics and publish regular updates on delivery and outcomes
- Refocus the workstream on tangible delivery, with stronger leadership and accountability.

PART B

The Legacy of PRAP



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02

STRUCTURE FOR CHANGE:

Why the Maturity
Matrix Matters

STRUCTURE FOR CHANGE: WHY THE MATURITY MATRIX MATTERS

Over the past year, the PRAP has taken an important, if overdue, step towards embedding anti-racism in policing infrastructure.

At the heart of this shift is the development of the **Maturity Matrix** – a new tool designed to assess police forces' progress against PRAP, not just on activity but on depth, consistency, and embedding of anti-racism work.

This tool, underpinned by an Anti-Racism Commitment, introduces a five-stage model – from *Initiating* to *Leading* – against which forces will be assessed.³ Its introduction is the most substantive development of the Programme to date and reflects growing recognition that sustainable change requires structured accountability. For the first time in policing in England and Wales, forces will be expected to show not just activity, but real, measurable change in their approach to race and policing. The introduction of this standard is a clear step forward and a genuine credit to the central team for driving it through.

But the **Maturity Matrix** comes late. For years, the ISOB, NBPA, and **civil society organisations** have urged PRAP to create a **Dashboard** to monitor and assess force-level progress on anti-racism. Previous ISOB reports recommended the introduction of "measurable and demonstrable performance frameworks."⁴ It is a shame, therefore, that this call is only being answered in PRAP's final year in its current format.



Although substantial groundwork has been laid since May 2024, there is still significant progress to be made over the next year while the central team remains in place. They must stay focused and demonstrate their value as a hub for coordination, insight, and accountability.

This section outlines the Maturity Matrix to ground our reflections on PRAP's current development. With only high-level information publicly available, we felt it important to clarify its foundations before assessing the priorities for the year ahead.

What is the Maturity Matrix?

The **Maturity Matrix** is a framework designed to assess how well police forces are progressing against the ambitions of PRAP. It aims to ensure that police organisations are moving beyond statements and towards demonstrable, embedded cultural, and operational change.

It sets out a five-stage maturity model, with forces assessed as: **Initiating**, **Challenging**, **Demonstrating**, **Innovating**, or **Leading**.

PRAP Maturity Matrix Progression Ladder (Direction of Progress Shown by Arrow)



Name

The term '**Maturity Matrix**' is both inaccessible language and bears an uncomfortable resemblance to the controversial "gangs matrix," which risks undermining trust and buy-in from the very communities it aims to serve.

While '**Maturity Matrix**' is a term commonly used by organisations such as the NHS to track progress and guide transformation, its use in policing requires greater care. Unlike internal tools, this matrix is intended to be used by the public to hold forces to account. The name must, therefore, be accessible and, most importantly, avoid associations with controversial systems like the "gangs matrix," which has been widely criticised for disproportionately targeting young Black men. This is crucial to maintaining public trust.⁵

Development

This work has been led by a small but consistent central team, with continuity of leadership via a seconded Superintendent from Thames Valley Police. This stability has allowed the model to evolve with greater clarity and purpose over time.

The team facilitated wide-ranging consultation with the following groups:

- Civil society organisations
- Staff networks and associations such as the NBPA
- Police forces and national policing bodies
- Statutory agencies including HMICFRS and the IOPC
- Central government

³ National Police Chiefs' Council (NPCC), *Police Anti-Racism Commitment (n.d.)* <https://www.npcc.police.uk/our-work/police-race-action-plan/police-anti-racism-commitment/> [accessed 23 May 2025].

⁴ Independent Scrutiny and Oversight Board (ISOB), *Police Race Action Plan: Independent Scrutiny and Oversight Board Annual Feedback Report, May 2023–May 2024* (August 2024) https://www.policeisob.co.uk/files/ugd/9e3577_53116603510b4d3784de5d4ca921fe01.pdf [accessed 23 May 2025].

⁵ Amnesty International UK, London: *Trident Gangs Matrix – Metropolitan Police* <https://www.amnesty.org.uk/london-trident-gangs-matrix-metropolitan-police> [accessed 4 June 2025].



The technical and forensic nature of the Maturity Matrix's design is one of its strengths.

The development work has produced a suite of detailed documents which have been shared with us, including:

- An **evidence base** that outlines the origins of each maturity standard, drawing on academic research, lived experience, civil society input, and examples of best practice.
- **Fourteen standards** covering key operational and cultural areas, each with defined goals, measures, and indicators.
- A **five-stage maturity model** (as shown above) that offers a phased view of organisational development and progression.
- A **draft implementation and testing schedule** involving selected forces throughout 2025.

The development process for the **Maturity Matrix** has improved over time, supported by a genuine effort to engage stakeholders. However, serious consultation challenges remain.

The technical and forensic nature of the **Maturity Matrix's** design is one of its strengths. Anti-racism work lives in the detail. It requires ongoing scrutiny, constant challenge, and vigilant oversight.

However, that complexity also makes it difficult to navigate, and its implementation highly resource-intensive. This tension was evident throughout the consultation process.

First, the development process did not involve the instruction of experts with practical experience in implementing anti-racism work through policy or change management.

Secondly, **civil society organisations** often reported feeling overwhelmed by the sheer volume of material or frustrated when invited to sessions without receiving documents in advance. Participants were expected to engage with detailed briefs and respond to complex questions. However, doing so meaningfully required substantial preparation, cross-organisational coordination, and an in-depth understanding of policing. As a result, conversations often stayed at surface level, with little time to interrogate the Maturity Matrix itself. Instead, discussions frequently veered towards broader concerns, such as the NBPA's temporary suspension of PRAP support, the role of the Home Office, or the resourcing challenges faced by scrutiny bodies.

These dynamics highlight a fundamental issue: the **Maturity Matrix** cannot succeed as an accountability tool unless those scrutinising it are resourced, trained, and supported in its use. Without this, scrutiny will remain symbolic, not substantive.

The ISOB has observed similar issues inside policing. Officers responsible for implementation remain unclear as to how to apply the **Maturity Matrix** in practice. In many forces, responsibility for PRAP delivery sits with small teams or even individuals, with little structure in place to assess maturity. Even where race action plans are more developed, the **Maturity Matrix** is often viewed as just another administrative requirement.

This uncertainty extends to national police leaders, including those who will inherit responsibility for PRAP delivery after March 2026. Few appear to understand how the handover will work or how they are expected to engage with or embed the **Maturity Matrix** in their work.

“

“For it to succeed, there will also need to be an attitudinal shift within policing.”

At present, there is little culture of open reflection or shared learning. **The College of Policing's Practice Bank**⁶, for example, lists over 250 entries tagged “race/ethnicity,” but almost all are categorised as “promising” or “innovative.” None reflect initiatives that “did not work.” This may require an aspirational level of reflection and is a criticism that can be levelled at many British institutions. For a tool like the **Maturity Matrix** to deliver, it will require an ability to openly and honestly analyse negative or underperforming outcomes.

Throughout our work, we have seen a reluctance to engage with failure – and a wider discomfort with criticism. There needs to be a cultural shift toward understanding **why** things do or do not work. Even when pilots or activities fall short of their goals, they offer valuable learning. Embracing this mindset is essential to becoming a genuinely reflective and learning organisation.

Transparency and Public Access

In March 2025, a PRAP update was published on the **National Police Chiefs' Council's** (NPCC) website, offering only a high-level summary of the **Maturity Matrix** standards.⁷ While it stated that further updates would be shared over the next 12 months, no timeline or supporting documentation was provided.

The ISOB recommends that the full Maturity Matrix documentation be published without delay.

Early publication would:

- Build national familiarity and understanding of the **Maturity Matrix**
- Allow for feedback, refinement, and greater public legitimacy
- Support scrutiny and external accountability
- Align with PRAP's stated commitment to transparency

We have been informed that testing will proceed in phases:

- **February – May 2025**
Initial testing in five police forces, focused on areas including community engagement and police leadership.
- **June – August 2025**
A second wave of force-level assessment trials involving around 10 forces.
- **From September 2025**
Planned full rollout across all forces.

This timeline means most forces will not see a full version of the Maturity Matrix until just six months before central PRAP funding ends in March 2026. It remains unclear whether national support and guidance will be in place by that point and the timeline lacks clarity as to when materials and access will be given to the wider public. Given this tight window, transparency and timely publication are not just helpful, they are essential to success.

⁶ College of Policing, *Practices: Support for Forces* <https://www.college.police.uk/support-forces/practices> [accessed 4 June 2025].

⁷ NPCC, *New Anti-Racism Commitment for Policing* Published, 24 March 2025 <https://news.npcc.police.uk/releases/new-anti-racism-commitment-for-policing-published> [accessed 23 May 2025].

Remaining challenges and areas for development

For the **Maturity Matrix** to reach its full potential, urgent work is still required across five core areas:

1 Moderation and accountability

A credible system for assessing progress must combine self-assessment with independent oversight. This includes:

- Transparent force-level self-evaluation, with checks to mitigate bias
- Independent moderation by the central team
- Peer and regional **benchmarking** for consistency
- Scrutiny and review involving subject matter experts, civil society and community

These mechanisms must be underpinned by agreed indicators and clear methodologies to allow for meaningful comparison across forces.

2 Public guidance and usability

The Matrix must be accessible to both professionals and the public. This requires:

- Clear definitions and maturity criteria
- Real-world case studies and examples
- A transparent evidence base showing how standards were developed
- Formats that make the material usable at local level

3 Presentation and data visualisation

How the Maturity Matrix is presented matters. To support public scrutiny, PRAP should prioritise:

- Force-level **dashboards** and summaries
- Real-time or regularly updated progress trackers
- Interactive visualisation tools where possible

Models from other sectors, such as the Preventable Deaths Tracker developed by Dr Georgia Richards, show what is possible with focus and intent.⁸



(a larger version of these charts are available in Appendix 1)

4 Sustainability and ownership

The Matrix cannot be treated as a one-off tool. To secure long-term impact, it must be embedded into mainstream accountability structures:

- Integrated into Home Office data collection processes (e.g. **Annual Data Requirements**)
- Used by **Police and Crime Commissioners** to monitor and hold forces accountable
- Formally incorporated into **HMICFRS** inspections and IOPC performance review
- Structured so that Matrix data can inform legal or regulatory processes

5 Permanent structures post-2026

After March 2026, PRAP's central resource will end. To sustain the Matrix:

- Forces must establish regional leads to adapt national tools to local contexts
- Central government should fund independent evaluators (e.g. academic institutions or NGOs)
- Quarterly review sessions and annual public hearings should be scheduled
- National coordination functions must be formally resourced beyond PRAP's current lifecycle

Mitigating bias in reporting and use of the Maturity Matrix

If the Matrix is to serve as a genuine tool for improvement, it must reflect reality, not just optimism. This means:

- **Reporting must be data-led**
Forces must use clear, objective data to demonstrate what, if any, progress is being made and to explain future priorities
- **Setting expectations for balance**
Forces must be guided to highlight both successes and areas of difficulty
- **Creating safe spaces for reflection**
Early stages could allow anonymised or non-punitive submissions to encourage openness
- **Requiring structured reflection**
Built-in prompts for "lessons learned" or "challenges encountered" can drive more honest assessments
- **Enabling independent moderation**
A panel of independent reviewers can check for over-reporting and prompt candour
- **Building feedback loops**
Forces should revisit earlier assessments and refine entries as learning develops
- **Modelling reflection from the top**
Senior leaders should demonstrate balanced reflection to build a culture of transparency and trust

⁸ Georgia Richards, *Preventable Deaths Tracker*, Preventable Deaths Tracker (2025) <https://preventabledeathstracker.net> [accessed 22 May 2025].



03

ANTI-RACISM IN POLICING AFTER PRAP



INTERNAL SCRUTINY AND ACCOUNTABILITY STRUCTURES

For anti-racism work to outlast any single plan or pledge, it must become integrated into the very core of policing. This requires robust internal structures that track progress, challenge poor practice, and learn from failure. When forces put in place clear, transparent mechanisms they create the conditions for lasting change. These tools can serve as early warning systems and engines of improvement, but only if they are independent enough to ensure honesty, resourced enough to be effective, and empowered enough to drive action.

Crucially, they require genuine leadership, and must be trusted by officers, communities, and those using them and treated as central to policing, not as peripheral add-ons.

The role of the Chief Constables' Council

For PRAP to succeed beyond its current funding and delivery structure, the Chiefs Constables' Council must now take clear and coordinated ownership of its future. Its leadership will determine whether PRAP becomes embedded within everyday policing or remains a time-limited initiative.

This responsibility includes providing national leadership and robust governance. As figureheads, Chiefs individually hold significant power, which can refocus national conversations about policing and race. It would, therefore, be positive to see Chiefs use their influential platforms to speak about the nuance and detail of anti-racism work in policing more frequently and consistently, both to officers within the service and to the public.

The Council must actively engage with the details of the PRAP central team's work. This would assist Chiefs with opportunities to share local work with peers and to identify areas of work that they can take back to their own forces. This kind of relationship would also encourage the PRAP central team to work in a manner that lends itself to dialogue and to proper record-keeping. It would facilitate the information sharing and coordination for which we have frequently heard forces and communities ask.

The Chiefs Constables' Council must start shaping what PRAP delivery will look like beyond March 2026.

Forces will lead delivery but will still need to ensure that work is nationally comparable, sufficiently transparent and properly coordinated. This includes embedding PRAP principles such as workforce development, data transparency, and inclusive community engagement into day-to-day policing practice. The Council must also reflect on whether March 2026 remains a realistic endpoint and be willing to plan ahead for scenarios including provision of further support or time.

The Chiefs Constables' Council must also ensure that national implementation priorities are grounded in real-world learning. Insights from peer visits, **HMICFRS** inspections, and lived experience panels should directly influence how PRAP is adapted and delivered. Where local innovation proves effective, or ineffective, it should be shared widely to support consistency and avoid duplication.

The role of the National Black Police Association

Voices from *within* policing – particularly those who experience it from both sides – also have a role to play. **The National Black Police Association (NBPA)** is one such voice, offering valuable insight into internal policing culture and practice. Yet, as with all internal networks, there are important limits to what the NBPA can achieve alone.

The NBPA holds a unique position in policing. It was born from the frustration of Black officers facing racism, unfair treatment, and disproportionate targeting by professional standards investigations – issues that persist today. Since the inception of PRAP in 2020, the NBPA has been a key stakeholder, helping to shape efforts to tackle racism in and by the police.

The NBPA and its local affiliates are often described as 'the canary in the coal mine', offering early warnings from inside the system. Their members experience policing both as insiders and as Black people navigating the same societal harms as the communities they serve. Their lived experience and organisational reach – spanning national, regional, and local levels – give them unique insight into policing culture and practice.

The NBPA operates within a wider ecosystem of staff networks, all of whom have a role to play in advancing **equality** and **inclusion** in policing. PRAP has the potential to strengthen alliances across race **equality** networks.

The NBPA remains a crucial partner for PRAP. Its insight into internal policing dynamics and organisational culture can help shape what meaningful accountability looks like. However, policing must be careful not to rely on Black Police Associations and race **equality** staff networks as a proxy for broader Black community engagement.

We have observed instances where the BPAs and internal staff networks were used in place of genuine external consultation. While these groups provide valuable expertise in lived realities and police culture, there is a risk of conflating their perspectives with broader Black cultural or racial expertise. Their input should complement, not replace, the voices of communities outside of policing.

Civil society organisations, in particular, have a critical role to play in ensuring that scrutiny is independent, visible, and rooted in the lived realities of those most impacted by policing practices.

BUILDING EXTERNAL OVERSIGHT

Over the past year, PRAP has taken some positive steps to open up dialogue with communities.

Between July and December 2024, three consultation events were held with key **civil society organisations**, focusing on the **Maturity Matrix** and Anti-Racism Commitment. These sessions gathered feedback and provided a platform for **civil society organisations** to challenge and shape PRAP's delivery. The central team also supported the creation of the **National Community Reference Group (NCRG)**, explored later in this chapter.

Furthermore, **civil society organisations** have begun to hold structured conversations with the PRAP central team and some Home Office representatives about building more permanent structures for ongoing scrutiny of anti-racism work in policing. We have observed and participated in workshops and conferences that have been supported by the PRAP central team and a conference in May 2025, led by **civil society organisations** themselves.

The PRAP central team has also consistently committed to circulating a detailed monthly newsletter providing updates about national and local work which has either been driven by the PRAP central team, local race action plan teams, or more broadly connected with the anti-racism goals of PRAP. PRAP has also published consultation and progress reports in August 2024, and an update report in March 2025.⁹ As a result, we have seen better informed discussions taking place between PRAP and external bodies with an interest in scrutiny of its work.

While these efforts mark good progress, they are just the start.

At the local level, police forces must show they are serious about tackling racial disparities and working with communities in ways they have not done before. Nationally, policing must partner with **civil society organisations** to co-design robust systems of scrutiny and accountability, and strengthen the formal accountability mechanisms that give these systems weight and legitimacy. This includes ensuring oversight is built into inspection frameworks, national data reporting, and independent monitoring structures.

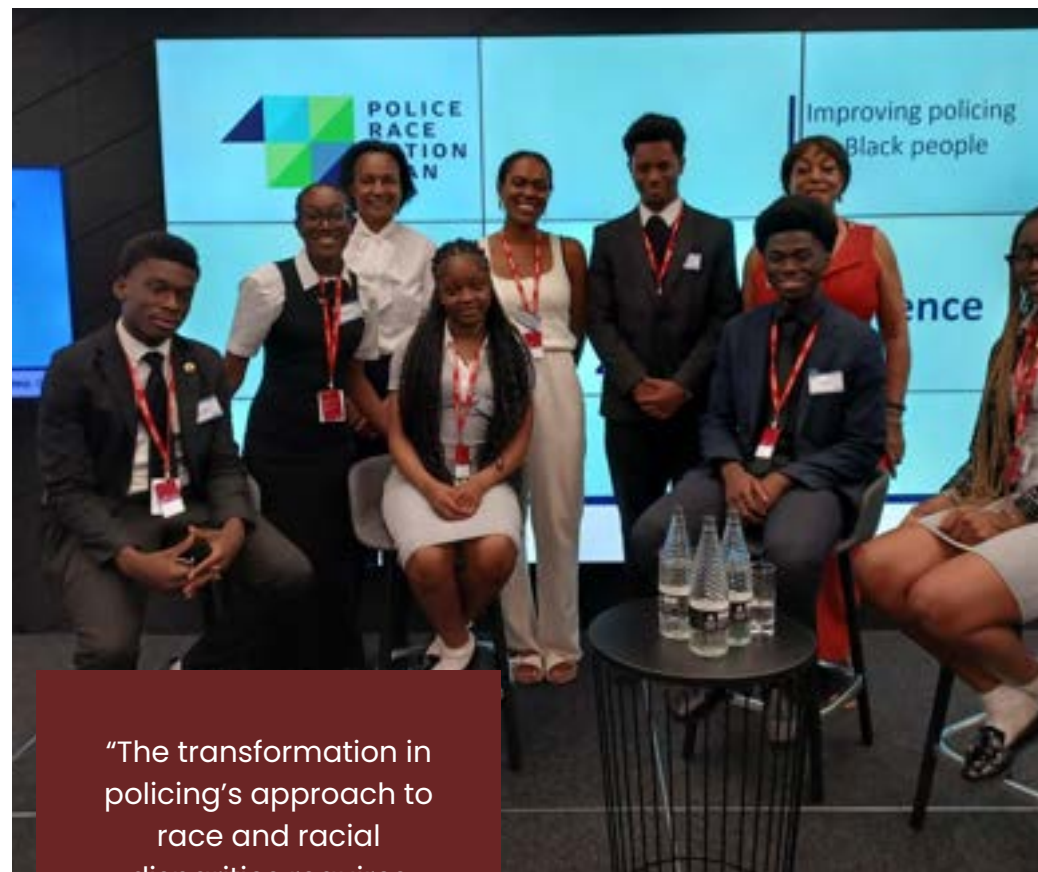
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"We have plenty of reports and insights - but what we need now is expert support to help us address the bias that drives human behaviour and the disproportionality we see across policing."

- Regional Policy Lead supporting implementation of a local Race Action Plan -

Without strong, co-designed oversight, the commitments made under PRAP risk becoming meaningless. Recent steps forward, such as increased civil society engagement and the Home Office's growing role, are encouraging. But this progress remains fragile. It must be strengthened, especially at the force level, to withstand the transition ahead.

Engaging the more “difficult to reach” and ‘unengageable’



"The transformation in policing's approach to race and racial disparities requires deeper, more honest engagement, particularly with groups that policing has historically neglected or labelled as “difficult to reach.”

One critical group is young Black people. Existing accountability and scrutiny structures in policing are still dominated by older, white participants.¹⁰ These spaces must be diversified. Additionally, new, alternative routes are also needed to better capture the concerns and experiences of younger Black communities and assess whether those experiences are shifting.

⁹National Police Chiefs' Council, *Police Race Action Plan Consultation Report* (August 2024) <https://www.npcc.police.uk/our-work/police-race-action-plan/police-race-action-plan-consultation-report/>; Progress Report (August 2024) <https://www.npcc.police.uk/our-work/police-race-action-plan/police-race-action-plan-progress-report/>; Update Report (March 2025) <https://www.npcc.police.uk/our-work/police-race-action-plan/police-race-action-plan-update-report/>

¹⁰ College of Policing, *Independent Advisory Groups and Scrutiny Panels in Policing: An exploratory study of current police force practices* (January 2024) <https://library.college.police.uk/docs/CoP/Independent-advisory-groups-scrutiny-panels-2024.pdf> [accessed 30 May 2025], pp. 23, 24, 27.

Understanding and addressing the intersection of age and ethnicity

Just for Kids Law, including the Children's Rights Alliance for England

It is our position that if racialised children are not treated as a distinct group, this will significantly undermine the credibility and impact of the PRAP. It is crucial that both the anti-racism commitment and the **Maturity Matrix** explicitly acknowledge the importance of an intersectional approach – recognising the specific vulnerabilities and experiences of racialised children in policing.

Our views on why it is important that children should be treated distinctly are set out below:

Unique vulnerabilities of children

The UN Committee on the Rights of the Child (CRC) makes clear that children must be treated differently because of their unique situation – they have distinct vulnerabilities, greater developmental needs and evolving capacities. This, when combined with the reality of a power imbalance between children and adults, means they must be treated differently when they come into contact with the police and criminal justice system.

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“We believe PRAP should explicitly align with recent recommendations from UN human rights bodies, particularly the Concluding Observations of the UN Committee on the Elimination of Racial Discrimination (CERD) and the CRC.”

In particular, the Plan must demonstrate how it is taking forward the recommendations relating to policing, racial discrimination, and the treatment of children and young people from racially minoritised communities. Given the UK's human rights obligations to children, we believe a Child Rights Impact Assessment (CRIA) should be carried out on the PRAP proposals so they are effective in relation to children.

CRIAs are an essential tool to help ensure policies and plans systematically and thoroughly consider children. The Department for Education has developed a template for officials to carry out a CRIA in partnership with the CRC Action Group, which is co-chaired by the Children's Rights Alliance for England (CRAE), and we would be happy to share this with PRAP colleagues.

Disproportionate criminalisation faced by racialised children

There continues to be significant **racial disparity** in relation to children's interaction with the police, with tensions and lack of trust exacerbated in recent years. Racist narratives of 'aggression' and 'propensity to violence' follow Black children throughout the systems with which they engage.

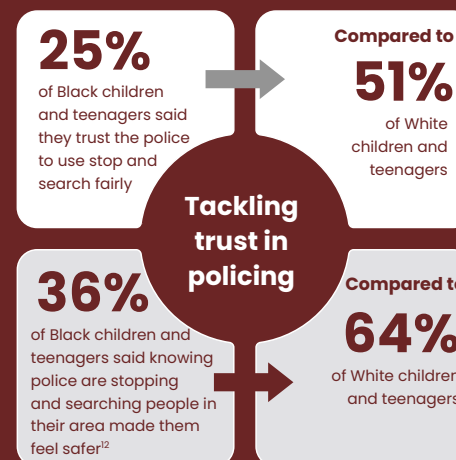
Consequently, Black children are often, construed as risks to the public and community and, not being afforded the notion of innocence due to perceptions of being older and, therefore, more responsible for their actions. This is known as **adultification** bias – a now widely accepted notion

Preventing long-term damage to children's lives and trust in policing

Involvement with the police and criminal justice system at a young age can have a long-term negative impact on children and young people's lives. PRAP must make clear about the importance and effectiveness of diverting children away from the criminal justice system rather than a punitive response. Evidence is clear that it is the more effective in preventing reoffending and ensuring all children can experience a fulfilling childhood and grow up to make a positive contribution to society. A child-first approach minimises all interactions between children and criminal justice processes to minimise trauma and prevent the development of a criminal identity.¹¹

Tackling trust in policing

Early negative experiences with the police can profoundly impact trust in police.



¹¹ Ministry of Justice, Review of the Youth Justice System in England and Wales. (2016) <https://assets.publishing.service.gov.uk/media/5a7ffc81ed915d74e622bcd6/youth-justice-review-final-report-print.pdf>

¹² Independent Office for Police Conduct, *Race Discrimination Report*, November 2024 <https://www.policeconduct.gov.uk/sites/default/files/documents/iopc-race-discrimination-report-Nov24.pdf>

¹³ Children's Commissioner, *Children's involvement in the 2024 riot* (28 January 2025) <https://www.childrenscommissioner.gov.uk/resource/childrens-involvement-in-the-2024-riots/>



Policing can also treat groups that question the legitimacy of the institution, particularly those advocating to defund or abolish the police, as off-limits for engagement. This continues to limit the breadth and honesty of PRAP's engagement work.

For anti-racism work to have real legitimacy, it must be able to hear from those who do not already agree with its premise. Engagement cannot be confined to those already willing to work within existing structures. Failing to include dissenting voices risks reinforcing the very exclusion PRAP is meant to address.

The Runnymede Trust, a leading independent think-tank on race **equality** and race relations in the UK, offers an instructive example. Long critical of UK policing, Runnymede highlights the **institutional racism**, misogyny, and homophobia documented in countless reviews, from the 1981 Scarman Report to the 2023 Casey Report. Its framing of policing as historically and structurally racist is uncomfortable but necessary.

Yet despite this critique, Runnymede still sees value in aspects of PRAP. Specifically, they highlight *Workstream 4: Protection of Communities* as an opportunity to push for alternatives to traditional policing such as community-based harm prevention, non-punitive interventions, and investment in structural solutions.

The fact that the PRAP central team has started engagement with Runnymede demonstrates an important truth: stakeholders who are critical of policing can still engage with programmes like PRAP if given the space to do so authentically. Criticism does not necessarily justify disengagement with them by the police. In fact, some of the most insightful contributions to accountability will come from those who are sceptical of whether policing can ever be truly anti-racist.

To succeed, policing must embrace this discomfort. That means creating space not only for collaboration, but for challenge – from groups whose very engagement may look like resistance.



PRAP and the Politics of Legitimacy

The Runnymede Trust on Why Anti-Racism Requires More Than Trust and Confidence



Over the last 50 years, a series of high-profile reports have exposed the harms and failures of policing. From the 1981 Scarman Report to the 2023 Baroness Casey Review, racism, and later misogyny and homophobia, have been found to be entrenched in the UK's largest police force – the Metropolitan Police. It is widely accepted that these findings are limited to the Metropolitan police, and are institutional in police forces around the country.

When we consider the history of policing, these findings are unsurprising. Beginning as a series of policing experiments in Britain and its colonies, in 1798, the Thames River Police were the first state-adopted and funded police force. They were a public-private partnership between the West India Committee (a lobby group of slave owners) and the Home Office, and assigned to protect the profits of slavery, to discipline the working class, and to protect colonialism and capitalism.

In this sense, racism has always been embedded into the very essence of policing as an institution and as a practice. Today, there continues to be significant racial disproportionalities.

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“Compared to their white counterparts, Black people are 3.7 times as likely to be stopped and searched and 3.2 times as likely to be subject to use of force, and Black children are 6.5 times more likely to be strip searched.”¹⁴

Which raises the question – can policing ever become anti-racist? We’ve witnessed multiple attempts to reform policing in the UK, including the amendment of the 1976 Race Relations Act to make public institutions, including the police, liable for acts of racial discrimination. Clearly, we have not gone far enough.

Progress is hampered by a tendency to either deny the existence of **institutional racism** or to respond with individualistic measures – this is, in other words, the ‘bad apples’ argument which we wholly reject. Institutional racism is concerned with racist processes and policies by design, and cannot be unravelled with light touch reforms.

PRAP’s vision to create an anti-racist police service is by all means laudable. But reducing harm and criminalised behaviour should be its ultimate goal – its focus on improving trust and confidence assumes policing practices are legitimate. Instead, we should be following the evidence base that dismisses diversity initiatives as effective in reducing racially disproportionate outcomes, and repeatedly shows that the police and punitive measures are not the best way to prevent harm and disorder.

Workstream 4, Safety and Victimisation, provides a great opportunity to push a different approach. Instead of continuing to try and enact reforms which have failed to deliver meaningful change, we recommend a shift in focus to non-policing alternatives to harm prevention and more community based forms of support and intervention. This, of course, means thinking more structurally to reverse the drivers of harm and criminalised behaviour.

Four years on from the introduction of PRAP we aren’t seeing the scale of change required. We recognise that the police do not hold full responsibility – the decline in social and material conditions and the harmful legislation being pushed through Parliament is at fundamental odds with what PRAP should be aiming for.

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“Only a societal reorientation towards community harm prevention will make a meaningful difference to the lives of people of colour.”

¹⁴ Accredited official statistics (gov.uk) Stop and search, arrests and mental health detentions, April 2023 to March 2024 <https://www.gov.uk/government/statistics/stop-and-search-arrests-and-mental-health-detentions-march-2024>; Police use of force statistics, England and Wales: April 2023 to March 2024 <https://www.gov.uk/government/statistics/police-use-of-force-statistics-april-2023-to-march-2024>; <https://www.gov.uk/government/statistics/police-use-of-force-statistics-england-and-wales-april-2023-to-march-2024#use-of-force-by-personal-characteristics> [both links accessed 11 June 2025].

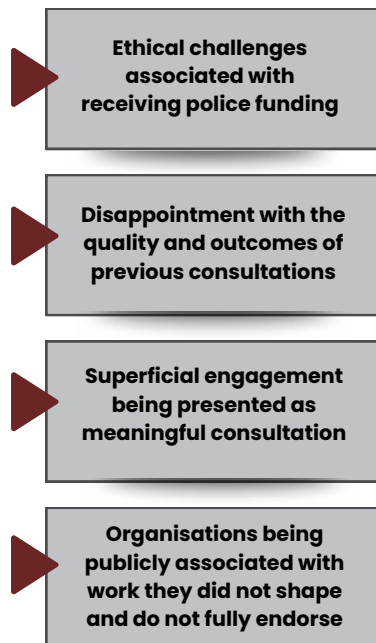
STRENGTHENING FORMAL ACCOUNTABILITY MECHANISMS

Home Office Coordination of PRAP Scrutiny

If PRAP is to deliver credible accountability, scrutiny must not only work in principle (nationally consistent and transparent) but also be trusted in practice. That trust cannot be built through police-led mechanisms alone.

Effective scrutiny requires more than structural independence. It relies on the confidence and active participation of **civil society organisations** and experts, especially those working to combat racism and hold policing to account.

Yet many of these organisations have raised serious concerns about taking part in oversight structures that are designed, hosted, or funded by police forces themselves. These concerns include:



These dynamics undermine the credibility of scrutiny efforts and risk further alienating communities most affected by policing practices.

Yet we recognise the difficult truth that the wider system is not immune from these challenges. Institutions such as the Home Office, **HMICFRS**, and the IOPC have themselves contributed to the very harms PRAP seeks to address.

This makes the task of building credible scrutiny even more urgent – and more complex. These bodies hold national power, but they lack the trust of many of the communities most affected.

That is why any national mechanism cannot simply sit within these institutions. It must be designed and led in partnership with independent **civil society organisations** and subject matter experts, placing their leadership at the centre.

The Home Office, despite its contested role, holds the authority to drive consistency across forces. However that authority must be exercised differently – by using its power to create space for truly independent oversight, not by controlling it. Achieving that balance is the true test of leadership.

Last year, the ISOB publicly called on the then newly-elected Government to take responsibility for PRAP.¹⁵ We argued that sustainable funding, proper accountability, and a long-term strategy for anti-racist policing could not be achieved without clear government leadership.

Since then, we have had conversations with a variety of stakeholders, including the Home Office and **civil society organisations**, about the principles that could underpin a credible and independent national scrutiny mechanism. While these discussions are still developing, they have informed the thinking reflected in this report. The following themes have emerged:

1

Independent governance

A national oversight board made up of civil society leaders, relevant experts, community advocates, and other relevant stakeholders, operating at arm's length from policing.

2

Secure and ethical funding

Dedicated Home Office funding to ensure the independence of the mechanism and to fairly compensate **civil society organisations** for their time and expertise, without compromising their autonomy.

3

Clear engagement standards

Transparent protocols for how organisations are invited to engage, how their contributions are used, and how their association with scrutiny activities is communicated publicly.

4

Public accountability

Regular publication of scrutiny outcomes, including stakeholder feedback and the actions taken in response. This should be visible to the public, not just policing or government.

5

Sufficient safeguards

To prevent the misrepresentation of stakeholder contributions.

¹⁵ Haroon Siddique, 'Plan to combat police racism needs full support of home secretary, report says', The Guardian, 15 July 2024, <https://www.theguardian.com/uk-news/article/2024/jul/15/plan-to-combat-police-racism-needs-full-support-of-home-secretary-report-says> [accessed 20 May 2025].

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"Community groups cannot be expected to support police reform without proper funding – meaningful scrutiny must be properly resourced."

Just for Kids Law, including the Children's Rights Alliance for England

Embedding PRAP accountability into HMICFRS inspection frameworks

Inspection is a proven lever for institutional action. PRAP's **Maturity Matrix** should be included in the inspections carried out by **HMICFRS**. This would make anti-racism part of the core standards every force is expected to meet.

At the NBPA's conference in October 2024, ISOB Chair, Abimbola Johnson, publicly raised this with His Majesty's Chief Inspector of Constabulary and His Majesty's Chief Inspector of Fire & Rescue Services, Sir Andy Cooke QPM DL. He said he was open to inspecting outcomes like those in PRAP, which many people welcomed as a good step forward.

However, this has not yet led to a clear commitment. In March 2025, Sir Andy Cooke confirmed that **HMICFRS** would continue to review racial disparities through existing inspections, such as the PEEL (Police Effectiveness, Efficiency and Legitimacy) framework and thematic reviews like the 2023 Section 60 super-complaint. There was no agreement to fully include PRAP or the **Maturity Matrix** in **HMICFRS**' formal inspection programme.¹⁶

This gap between what stakeholders hoped for and HMICFRS' current position needs to be addressed if PRAP is to achieve real, measurable progress. In the short-term, PRAP data could be better linked to existing inspection tools such as PEEL. However, short-term fixes will not be enough.

Long-term accountability needs a clear plan to fully embed PRAP outcomes into police inspection standards. This will require leadership from the Home Office, working with the NPCC and the PRAP central team, to secure a formal commitment from HMICFRS.

This should include:

Formal recognition

of the **Maturity Matrix** as a tool to assess progress on race equity in policing

New PRAP-related indicators

within the PEEL framework or in a dedicated inspection area

Consideration of formal direction

from the Home Office to ensure HMICFRS is required to prioritise PRAP in its inspections

Turning this into action will require a series of practical steps, focused on building the right relationships, aligning data, and securing the formal commitment needed to make PRAP part of core police inspections.

These steps should include:

1 Strategic engagement with HMICFRS

- Set up a working group between PRAP leadership, **HMICFRS**, and the Home Office to define inspection-ready indicators aligned with the **Maturity Matrix**.
- Secure clear statements of intent from **HMICFRS** on how PRAP outcomes will be monitored through inspections, including timelines and scope.

2 Align existing data with PEEL framework

- In the short-term, map existing PRAP data to PEEL inspection points, allowing for preliminary scrutiny within the current framework.
- Ensure forces are guided on how to report data in a manner consistent with PEEL requirements.

3 Formalise HMICFRS mandate via ministerial direction (if necessary)

- If voluntary alignment proves insufficient, consider the use of a formal directive from the Home Office mandating **HMICFRS** to include PRAP inspection within its statutory functions.
- Explore legal and policy options to support this directive, ensuring it aligns with **HMICFRS**' independence and public accountability standards.

4 Communicate with stakeholders

- Provide regular updates to civil society and oversight bodies on the progress of these discussions.
- Ensure transparency in how PRAP outcomes are being incorporated into inspection mechanisms to maintain stakeholder trust.

5 Review and adapt the Maturity Matrix

- As inspection alignment progresses, refine the **Maturity Matrix** to ensure its indicators are measurable and outcome-focused.

¹⁶National Police Chiefs' Council (NPCC), *Police Race Action Plan: Update Report* (March 2025) <https://www.npcc.police.uk/sysSiteAssets/media/downloads/our-work/race-action-plan/police-race-action-plan-update-report.pdf> [accessed 30 May 2025].

LOCAL AND NATIONAL SCRUTINY IN PRACTICE

Community engagement at force level

The College of Policing has developed guidance on transparency and engagement, which is now expected to be published in early 2026 alongside the revised stop and search APP, which we discuss in further detail later in this report. At the point of publication, the guidance will be a full year overdue, leaving a prolonged vacuum at a time when clear expectations are critical.

Since this is PRAP's final year, it would have benefited forces to have received and started implementing this guidance earlier. Doing so could have maximised its impact and ensured a smoother transition. When it is eventually published, its adoption cannot be optional. Every police force must demonstrate how the guidance is being translated into meaningful, measurable change. This will be a key piece of work with the potential to shape how transparency and engagement are embedded across policing.

While community relationships are primarily the responsibility of local policing, the PRAP central team has a vital role to play in supporting this work. It should act as a strategic enabler, providing consistent guidance, sharing learning, and amplifying community voices across the system.

The team can help ensure national portfolio leads, including the NPCC's Local Policing Coordination Committee, are fully briefed on PRAP's engagement work and the barriers it has faced.¹⁷ Forces across the country often encounter similar challenges in building trust. By collating these common issues and sharing examples of what has worked elsewhere, the central team can promote more coordinated, effective action.

Although *The College of Policing's Practice Bank* was intended to serve this function, it remains underused.¹⁸ The central team can bridge this gap by collecting learning from strong local initiatives and sharing it through proactive support, not just passive repositories.

The team is also well placed to identify recurring themes from communities and reflect that feedback to forces while directing them to solutions.

In the year ahead, the central team should prioritise its role as connector, standard-setter, and advocate, embedding meaningful community engagement across all levels of policing.

The role of the National Community Reference Group (NCRG)

Established in March 2024, the **NCRG** was created to provide independent advice and lived experience to PRAP and broader national policing efforts. Its formation was intended to bring critical voices particularly from Black communities into policing discussions at a national level.

The **NCRG** brings together individuals from a wide range of backgrounds, including lawyers, community leaders, communications specialists, academics, and current and former police officers and staff.

We have been informed that since its inception, the **NCRG** has been consulted on several key and sensitive issues, including:

- Force-level performance and delays in the delivery of PRAP
- The police shooting of Chris Kaba
- The 2024 far-right riots
- The role of civil society and young people in police scrutiny

The group's actual influence on outcomes remains unclear. Its membership is not published, and there are no visible reporting structures or published outputs linked to its work. Several challenges impede its effectiveness:

Lack of defined objectives

The group operates without clear goals or benchmarks, making it difficult to measure its success

Unclear impact

There are currently no mechanisms for the public or communities to assess what the **NCRG** is doing or how it is influencing change

Limited transparency

The absence of transparent evaluation processes risks diminishing the group's credibility

Perception risk

Without visibility and clear outcomes, the **NCRG** may be seen as a symbolic body lacking real influence or accountability

There is still uncertainty about the long-term role and purpose of the NCRG. This is particularly concerning, as strong and visible community engagement is essential to the credibility and impact of PRAP.

With the right investment and clearer direction, the **NCRG** has the potential to play a much stronger role. To achieve this, the following actions are recommended:

Define clear objectives:

Establish measurable goals and success indicators

Demonstrate impact:

Regularly communicate outcomes and contributions to national policing efforts

Ensure transparency:

Develop and publish evaluation frameworks for public accountability

Build trust:

Engage meaningfully and consistently with the communities it is meant to represent

Strengthen leadership:

Maintain adequate resourcing and leadership capacity to drive strategic progress


¹⁷ National Police Chiefs' Council (NPCC), *Local Policing Coordination Committee* (n.d.) <https://www.npcc.police.uk/our-work/work-of-npcc-committees/local-policing-coordination-committee/> [accessed 23 May 2025].

¹⁸ College of Policing, *Practice Bank* <https://www.college.police.uk/support-forces/practices> [accessed, June 2025]

PART C

Workstream Specific Feedback

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04

WORKSTREAM 1: CULTURE AND WORKFORCE

(Formerly Internal Culture and Inclusivity)

WORKSTREAM 1

Creating a police service that reflects and respects the communities it serves is not just a matter of representation. It is essential to rebuilding trust. Workstream 1 aims to improve the recruitment, retention, and progression of Black officers and staff, while challenging the cultures that have allowed racism, misogyny, and other forms of discrimination to take root.

Yet the reality is that policing still falls short.

1.3%

of the police workforce in England and Wales is Black

a figure that has barely shifted in more than a decade.¹⁹

Black people make up 4% of the population of England and Wales.²⁰

High-profile cases of police misconduct have exposed a culture that too often protects harmful behaviours instead of rooting them out. National recommendations (including the **Baroness Casey Review**, the Angiolini Inquiry, and the Macpherson Report) have made it clear that change must go deeper, with every force committing to become actively anti-racist, anti-misogynistic, and anti-discriminatory in both words and action. Workstream 1 is meant to help make that shift a reality.

While we recognise the scale and ambition of this workstream, the overall pace and consistency of this work have been uneven. Across every part of Workstream 1, we see common challenges that risk limiting its impact:

Delays and inertia

Key actions have slowed or stalled. Resource pressures are a reality, but they cannot excuse weak prioritisation, gaps in leadership, or poor planning.

Measurement and impact

Currently, there is no clear way to measure whether any of this is working. Without putting the **Maturity Matrix** into practice, progress risks becoming a paper exercise rather than real cultural change.

Weak accountability

When progress stalls, NPCC portfolio leads are not always held to account. Stronger governance is needed to challenge inaction and keep delivery on track.

Below, we provide an assessment of the specific actions, noting both progress and critical areas that require further attention to ensure Workstream 1 can deliver on its stated aims.

PROGRESS AGAINST PRAP ACTIONS

1 Black history education

Policing's relationship with Black communities is shaped by a long and difficult history. Recognising that history – and learning from it – should be a foundation for cultural change. **The College of Policing** has taken positive steps by creating 21 dedicated learning modules on Black history. These are now available to all forces through College Learn, a policing learning platform introduced in 2021. These modules appropriately contextualise the historical relationship between the police and Black communities. However, two significant issues have been identified:

- **No clarity on who the learning is for.** It is not clear whether these modules are aimed at new recruits, frontline officers, senior leaders, or the wider workforce. Without this clarity, it is impossible to know whether the right people are taking part or whether the learning is being put into practice.
- **No evidence of impact.** There is no data showing how widely these modules are being used or whether they are changing attitudes and behaviours. This makes it impossible to judge whether the learning is making any real difference in forces.

PRAP and **The College of Policing** must set clear expectations about who should complete this learning and why. Forces must also be required to monitor uptake and share evidence of impact, using the **Maturity Matrix** to assess whether the learning is driving meaningful cultural change.

2 Recruitment and progression

If policing cannot recruit, retain, and promote Black talent, it cannot claim to be fair or representative. Recognising this, the Plan commits to improving not only recruitment but also retention and progression, key factors in building a diverse and resilient workforce.

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“The data shows that if you are white, you are more likely to pass the sergeants and inspectors exam than Black colleagues. We have taken this as far as we can locally. We now need national leadership to review the system and drive change.”

– Regional Policy Lead supporting implementation of a local Race Action Plan –

A catalogue containing the national standard for recruitment, retention and progression has been developed by **The College of Policing** and shared with forces in September 2024. It aims to provide forces with a consistent framework to improve **diversity** and, for the first time, to address the intersectional barriers faced by Black women in policing.

¹⁹ GOV.UK, *Police Workforce, England and Wales*, 31 March 2024 <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2024/police-workforce-england-and-wales-31-march-2024#chapter8> [accessed 6 June 2025].

²⁰ Office for National Statistics, *Ethnic group, England and Wales: Census 2021*, <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/bulletins/ethnicgroupenglandandwales/census2021> [accessed 3 July 2025].

Since the catalogue was only published in September 2024, there is understandably limited evidence of impact at this stage. It will likely take several years to fully assess the outcomes of this work, making it essential for forces to prioritise and consistently apply the standards from the outset.

To support meaningful evaluation in the future, implementation must now become the central focus. The **Maturity Matrix** has a critical role to play here. It should track whether forces are aware of the standards and how they are embedding them in practice, laying the groundwork for a credible assessment of impact over time.

In policing, pay gaps often reflect structural inequalities, such as the underrepresentation of minority ethnic officers in senior roles, shorter average service lengths or bias in performance evaluations.

For example, in the British Transport Police's 2023 ethnicity pay gap report, its analysis found that Black colleagues were less likely to receive a top mark and more likely to be assessed as a poor performer.²²

3 Ethnicity pay gap reporting

Ethnicity pay gap reporting measures the difference in average pay between minority ethnic and white staff. While not yet a legal requirement, it has been the subject of national debate for several years as a key tool for exposing and addressing structural inequalities in the workplace. In March 2025, the Government launched a consultation on proposals to introduce mandatory ethnicity pay gap reporting for large employers.²¹ This marks a significant step forward, but action remains voluntary for now.

It is, therefore, commendable that more police forces have begun publishing their ethnicity pay gap data. Some have published ethnicity pay gap data for several years, with the Metropolitan Police reporting since 2017 and the British Transport Police reporting since 2022.

In 2022, PRAP put forward a proposal to the **Chief Constables' Council** for all forces to adopt ethnicity pay gap reporting by the 2023 to 2024 financial year, aiming to drive greater consistency and transparency across the service. As of June 2025, we can see evidence of 10 out of 43 forces publishing this data.²³ This falls short of the original ambition, and there is an urgent need to increase publication rates.

Growing interest from the government is a welcome development because such high-level attention may be necessary to ensure full compliance across all forces.

While publishing data is a positive step, its value depends on what is done with it. There is limited information as to whether pay gaps are narrowing or whether leaders are taking meaningful action in response. All forces should be expected to publish clear action plans alongside their data, with regular public updates on what has changed in practice. The **Maturity Matrix** should reflect this by tracking whether data is published and how it is being used to drive measurable change.

4 Black Workforce Survey

The Black Workforce Survey is one of the few tools that captures the lived experience of Black officers and staff across policing. Previous surveys have exposed persistent inequalities with many respondents reporting feelings of exclusion, the need to work harder than their white peers for the same recognition, and serious consideration of leaving policing due to discrimination and lack of support.²⁴ This makes the continuation and expansion of the survey vital to understanding whether policing is becoming a safer and fairer place for Black people who serve within it.

After significant delays, the most recent survey was finally launched in March 2025. There is still no equivalent survey that captures the views of the wider (non-Black) police workforce, making it difficult to compare experiences or track disparities across different groups on experiences and institutional culture.

5 Hate crimes against Black officers

Policing's credibility is undermined when it fails to protect its own people. Efforts by PRAP to address race-based hate crimes against Black officers have stalled since May 2024. The previous lead for hate crime has not been replaced meaning there is no dedicated national lead to push Chief Constables to agree and pursue a set of actions to tackle the issue. This sends the wrong message to Black officers and staff, who continue to face racism in the line of duty without adequate institutional backing.

PRAP must urgently appoint a senior NPCC lead. There are a number of Chiefs who have portfolio areas that cross over with hate crime that could potentially take on this work even on an interim basis. Whomever does should consider prioritising the creation of a national timetable, and setting out how forces will be held to account for protecting their own workforce from race-based hate.

Whomever does should consider prioritising the creation of a national timetable, and setting out how forces will be held to account for protecting their own workforce from race-based hate.

6 Misconduct, discipline and vetting

Tackling racial disparities in misconduct, discipline, and vetting is critical to building fairness and trust in policing. These systems are meant to protect policing from wrongdoing, but when they reinforce bias or are weaponised against Black officers, they deepen injustice and damage credibility. For example, the **Baroness Casey Review** into the Metropolitan Police Service revealed that Black officers are 81% more likely to face misconduct proceedings compared to their white colleagues.²⁵ Without urgent reform, these disparities will continue to erode confidence – both within the service and among the communities policing exists to serve.

From the ISOB's perspective, there has been no visible work to investigate or address the racial disparities in vetting and misconduct outcomes. Non-delivery in this area risks confidence in the PRAP programme among Black and minority ethnic officers. NPCC leads must take meaningful and visible ownership of these matters, particularly given their significance to their workforce.

Since sharing early versions of this report with the NPCC and central team, we have been informed that background work has been initiated: creation of a new national vetting task group, disproportionality analysis, development of bespoke Professional Standards Department training with the College, and joint NPCC/APCC efforts on training for independent members and PCCs to strengthen accountability around disproportionality in disciplinary systems. These have not featured in substantive updates given to the ISOB or PRAP programme board. We will prioritise reviewing the detail of this work over the coming months.

²¹ GOV.UK, *Equality (Race and Disability) Bill: mandatory ethnicity and disability pay gap reporting (2025)* <https://www.gov.uk/government/consultations/equality-race-and-disability-bill-mandatory-ethnicity-and-disability-pay-gap-reporting> [accessed 20 May 2025].

²² British Transport Police Authority (BTPA), *Ethnicity Pay Gap Report 2023* (April 2024) https://btpa.police.uk/wp-content/uploads/2024/04/BTPA-Ethnicity-Pay-Gap-Report-2023-including-Chiefs-Foreword_secure.pdf [accessed 6 June 2025].

²³ Metropolitan Police Service, Greater Manchester Police, British Transport Police, Gwent Police, North Wales Police, Hampshire & Isle of Wight Constabulary, Leicestershire Police, Northamptonshire Police, Wiltshire Police, and Hertfordshire Constabulary.

²⁴ National Police Chiefs' Council (NPCC), *Findings from our Black Workforce Survey: Wave 2 (2024)* <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/workforce/2024/findings-from-our-black-workforce-survey-wave-2.pdf> [accessed 20 May 2025].

²⁵ Louise Casey, *The Baroness Casey Review: An independent review into the standards of behaviour and internal culture of the Metropolitan Police Service* (London: Metropolitan Police Service, 2023) <https://www.met.police.uk/SysSiteAssets/media/downloads/met/about-us/baroness-casey-review/update-march-2023/baroness-casey-review-march-2023a.pdf> [accessed 20 May 2025].

7 Leading inclusive teams

Frontline leadership is one of the most powerful levers for changing officer behaviour and improving community trust.

the College introduced a '**Leading Inclusive Teams**' pilot in December 2024 aimed at empowering supervisors to lead cultural change.²⁶ It is now underway in Staffordshire, Gwent and Surrey, with results expected in early 2026.

The decision to pilot this work before scaling nationally is the right one but the impact of the pilot must be properly evaluated. **The College of Policing** led the evaluation, and we raised concerns about independence. The College has stated that all College researchers involved are members of the Government Social Research profession which requires objectivity and impartiality and further that the report will be independently peer reviewed. If the pilot proves effective, policing leaders must commit to fully resourcing and delivering a national rollout, ensuring every supervisor has the tools and confidence to lead cultural change in practice.

8 Access and support for BPAs and Race Equality Networks

In 2022, the NPCC committed to identifying "what additional support is required to enable BPAs and **Race Equality Networks** to provide strategic advice to chief officer teams, bespoke welfare support to members and enhance community engagement."²⁷

Yet, as noted earlier in this report, the NBPA withdrew its support for PRAP between June and November 2024, citing a lack of promised resources as one of the key reasons.²⁸

In its July 2024 Progress Report, PRAP references new guidance for chief officers to help officers and staff access local BPAs and **Race Equality Networks**. However, this falls far short of the original ambition. Issuing guidance to assist with access to local groups is not the same as resourcing participation or enabling genuine influence. The same reference appears again in PRAP's March 2025 update report, raising questions about what, if any, further progress has been made.

The NBPA has also reported a decline in support for its local networks in recent years. There is a lack of transparency in this area. Policing does not provide publicly available data to track force-level access or investment in these structures; nor does it appear to have a consistent standard for associations and networks to meet in order to qualify for resourcing. This opacity creates uncertainty for key organisations such as BPAs. The active involvement of partners like the NBPA and staff **Race Equality Networks** is key to PRAP delivery. Proper resourcing is vital.



²⁶ College of Policing, *Leading Inclusive Teams: Evaluation* (n.d.) <https://www.college.policing.uk/research/projects/leading-inclusive-teams-evaluation> [accessed 23 May 2025].

²⁷ NPCC, *Police Race Action Plan* (2022), page 25, <https://www.npcc.policing.uk/our-work/policy-race-action-plan/> [last accessed, 22 May 2025].

²⁸ National Black Police Association, *Press Release on Suspension of Support for PRAP*, (September 2024) <https://nationalbpa.com/press-release-on-suspension-of-support-for-the-police-race-action-plan/> [last accessed 13 May 2025].

The NBPA on rebuilding trust and power-sharing in PRAP

The NBPA Executive Committee

The NBPA has been a key stakeholder in the development of PRAP, bringing decades of experience, insight, and lived reality to the table. Our engagement has always been principled – we have supported the ambition of PRAP but remained clear-eyed about its limitations.

Disappointingly, rather than witnessing improvements, we are seeing a worsening environment for Black and ethnic minority officers and staff, alongside persistent racial disparities in policing outcomes. The plan has too often become a compliance exercise rather than a catalyst for cultural and systemic transformation.

We have also observed with concern that some Chief Constables remain resistant to PRAP's aims, hiding behind a blanket endorsement from the NPCC while failing to deliver real action in their own organisations. This lack of leadership courage undermines the integrity of the plan. Furthermore, there remains a critical gap in local accountability structures – too often, local scrutiny is either absent, toothless, or disconnected from those with lived experience. That must be addressed in the longer term if we are serious about embedding lasting change.

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“PRAP’s legacy must be more than well-intentioned commitments. True success would see a measurable shift in how race is understood and addressed within policing – from recruitment and progression, to misconduct outcomes, to the experiences of the public.”

To support this, the NBPA recommends the immediate establishment of a public-facing dataset, co-designed and agreed upon by stakeholders, against which all forces can be transparently inspected.

We are also calling for a reconfiguration of the ISOB. One that widens its remit and representation. Scrutiny must move beyond internal processes and include a new body housed within the Home Office, which brings together the NBPA, **civil society organisations**, and community leaders to ensure policing is held to account by the people it serves. This would mirror processes developed after the report into the racist murder of Stephen Lawrence by Lord Macpherson and provide internal and external scrutiny, accountability and advocacy.

In addition, the NBPA strongly recommends that the Metropolitan Police's London Race Action Plan be separated and made distinct from the national PRAP. The Metropolitan Police's cultural challenges are both extreme and relatively unique, and its approach to race equality has too often acted as a blockage to national progress. A bespoke, high-scrutiny framework for London is essential, one that reflects the scale of harm, lack of trust, and historic failure to act – so it no longer undermines reform efforts across the rest of the UK.

As an association, our role is unique. We Since re-engaging, we have taken measured steps to rebuild trust and collaboration. However, we have been disappointed by the tepid and, at times, perfunctory response from the NPCC and the PRAP team. Re-engagement must be matched with meaningful action and a genuine willingness to share power – not simply a return to the status quo. In fact we feel that PRAP has become a barrier to engagement with NPCC and The College of Policing.

The current policing environment has not only failed to improve—it has become increasingly hostile. During the lifetime of PRAP, we have heard appalling reports from our members: bananas left on desks as racist messages, officers receiving reflective practice – not formal sanctions – for using the 'N' word, and a growing normalisation of discriminatory behaviour. Behind these incidents are real people, not just statistics. We have supported colleagues who have considered ending their own lives due to the organisation's failure to protect them or take racism seriously. These are not isolated anecdotes – they are symptoms of a deeper institutional complacency, and they must serve as a wake-up call to everyone in leadership.

There is a clear and dangerous gap in current provisions. Neither the Police Federation nor the Police Superintendent Association is equipped or mandated to respond to the specific needs, risks, and lived experiences of Black officers and staff. The NBPA is left trying to fill that void with limited resources and limited formal recognition.

If the service is serious about building trust, retaining talent, and transforming its culture, that gap must be closed—with urgent investment, structural support, and legal recognition of the NBPA's role. It is disappointing that unofficial networks who do not support members with misconduct or discrimination have been supported by NPCC or their local forces whilst the NBPA have seen their resources diminish in potential victimisation for calling out wrongdoing and supporting members suffering discrimination.



“

“Our long-term vision is rooted in the same ethos that led to our formation: a policing service that listens, reflects, and acts –not just for public relations, but for equality and justice. A service where Black officers are safe to serve, and Black communities are treated with dignity and respect. To reach that goal, the NBPA must be empowered not as a stakeholder to consult, but as a strategic partner to co-deliver. Anything less is a continuation of the silence, avoidance, and harm that PRAP was meant to end.”

In response to the NBPA contribution, the PRAP central team has said they have and will continue to try and engage the NBPA in its work. The team briefed all NBPA branches about the maturity matrix and has offered to host further briefings on any subjects requested by the NBPA. The NBPA continues to be represented on the PRAP programme board and is involved in a small working group shaping the detail of the maturity matrix.

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05

WORKSTREAM 2: POWERS AND PROCEDURES (Formerly Use of Powers)

WORKSTREAM 2

Workstream 2 of PRAP is focused on how police powers are used, from vehicle stops and stop and search to taser, strip-search, and arrest. These are some of the most visible and contested aspects of policing. How they are applied has real and lasting consequences for public trust.

The well-documented disproportionate use of police powers against Black people has caused deep and lasting trauma. It is the persistent racial **disproportionality** in the use of these powers that fuels mistrust. Without reform here, PRAP cannot succeed. That is why this workstream is, arguably, the lynchpin of PRAP.

Following a long period of limited progress, the past year has brought a noticeable shift. As noted in our 2024 report, a new Workstream Lead has brought greater clarity, direction, and energy to the workstream. Activity has increased, data reforms have begun, and new trials, from trauma-informed training to updated body-worn video guidance, are showing potential.

There is more structure, more consistency, and more engagement than we have seen in previous reporting periods. Communication between the national PRAP team and partner agencies has improved, helping to lay the groundwork for substantive change.

Nonetheless, serious concerns remain. Technology such as live facial recognition is being rolled out without PRAP oversight. Some scrutiny panels lack independence. Most importantly, there is still little evidence that this work is leading to better outcomes for Black communities.

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"We need a nationally mandated framework to assess every police force's starting point and progress on anti-racism, backed by independent inspection from a body that is representative and expert in anti-racism, not just policing."

– Regional Policy Lead supporting implementation of a local Race Action Plan –

This chapter reviews the current state of delivery across Workstream 2, highlighting both encouraging developments and areas requiring immediate attention.

PROGRESS AGAINST PRAP ACTIONS

1 Public and Personal Safety Training

How officers are trained to handle confrontation is vital. It shapes whether situations are escalated or de-escalated, whether force is used proportionately, and whether the public can trust that officers will act safely and fairly. For Black communities, who experience higher rates of force and more frequent contact with police, this training can be the difference between safety and harm.

Over the past year, **The College of Policing** has redesigned **Public and Personal Safety Training (PPST)**. This is mandatory training provided to police officers, special constables, and police staff to ensure they are equipped to manage violent or potentially violent situations safely.²⁹ This has been one of the more promising developments under Workstream 2.

A new, trauma-informed and scenario-based model for conflict management has been trialled in Avon & Somerset as part of this work.

The report indicates a reduction of 1,200 uses of force across both Black and white individuals – an overall reduction of 11%.³⁰

This is a welcome sign that alternative approaches to conflict can reduce the use of force overall.

It is important to note that, due to small sample sizes, the reduction in uses of force against Black people was not statistically significant.³¹ Nonetheless, the trial demonstrates potential for wider benefit, especially if forces track and implement it with **racial disparity** outcomes explicitly in mind.

The model shows potential but must now be tested at scale with a sharper focus on race disparity. If policing is serious about reducing harm, it must ensure that trauma-informed training is not just adopted broadly, but assessed specifically for its ability to address racial **disproportionality** in the use of force. Effective communication, with an emphasis on de-escalation, is also critical. Particularly when engaging with children and young people.

2 Vehicle stops: more than just Section 163

Being stopped while driving is one of the most common ways that members of the public come into contact with the police. For Black drivers, that contact is often shaped by suspicion, not safety. From Ricardo dos Santos and Bianca Williams to thousands of other unrecorded cases, disproportionate vehicle stops have become a visible symbol of over-policing and racial bias against the Black community.

For decades, campaigners have called for proper data collection on these encounters. A key recommendation from the 1999 Stephen Lawrence Inquiry was that forces should collect and publish ethnicity data on all vehicle stops.³²

That recommendation was not acted on for more than 20 years.

²⁹ College of Policing, *New public and personal safety training introduced*, published 13 August 2024 <https://www.college.police.uk/article/new-public-and-personal-safety-training-introduced> [accessed 20 May 2025].

³⁰ College of Policing, *Evaluation of scenario-based conflict management training*, page 6, (August 2024) <https://library.college.police.uk/docs/college-of-policing/Evaluation-conflict-management-training-2024.pdf> [Accessed 22 May 2025]

³¹ College of Policing, *Evaluation of scenario-based conflict management training*, page 52, (August 2024) <https://library.college.police.uk/docs/college-of-policing/Evaluation-conflict-management-training-2024.pdf> [Accessed 22 May 2025]

³² William Macpherson, *The Stephen Lawrence Inquiry: Report of an Inquiry by Sir William Macpherson of Cluny* (London: The Stationery Office, 1999) <https://assets.publishing.service.gov.uk/media/5a7c2af540f0b645ba3c7202/4262.pdf> [accessed 20 May 2025].



“That the Home Secretary, in consultation with Police Services, should ensure that a record is made by police officers of all “stops” and “stops and searches” made under any legislative provision (not just the Police and Criminal Evidence Act). Non-statutory or so called “voluntary” stops must also be recorded. The record is to include the reason for the stop, the outcome, and the self-defined ethnic identity of the person stopped. A copy of the record shall be given to the person stopped.”

– Stephen Lawrence Inquiry (Macpherson Report), Recommendation 61, 1999

Research continues to underline the value of improved data. In *Gone Fishing: The Operation of Police Vehicle Stops in England and Wales*, Liverpool University, considered six years of ethnographic research. The report makes a strong case for recording all vehicle stop checks, not just those that escalate to search or enforcement. This data could support more effective scrutiny and highlight patterns of **racial disparity**.³³

Progress is now finally being made. In the past year, PRAP has worked with the NPCC Roads Policing team to expand data collection beyond just Section 163 stops.³⁴ All vehicle stops are now expected to include demographic data. The PRAP team has also worked with the Home Office to establish a new **Annual Data Requirement (ADR)** that will make it mandatory for all forces to record ethnicity data on vehicle stops by 2026/27.

Early signs of adoption are encouraging. All forces are now collecting at least some demographic data, and the Metropolitan Police has committed to a London-wide rollout from September 2025. This is a significant improvement from last year’s report in which we highlighted concerns about the Metropolitan Police’s lack of implementation in this area.

PRAP has also initiated changes to national policing guidance so that vehicle stop data must be analysed for racial **disproportionality** and legitimacy. These changes are expected to be embedded by late 2026.

This is an important shift. Recording data is the first step towards transparency and accountability. But to build public trust, forces must also explain how this data will be used to identify and reduce racial disparities. The **Maturity Matrix** must set out clear expectations for analysis, publication, and action. That way these reforms lead not just to more data, but to fairer outcomes.

3 Technology

Technology plays a growing role in how police powers are used, monitored, and experienced. When designed and applied fairly, it can help improve transparency and build trust. But when left unchecked, it risks reinforcing existing biases and deepening racial disparities.

Over the past year, there has been important progress. Updated national guidance on BWV now includes a 30-second pre-record feature, capturing footage just before an officer activates their camera. Most forces have adopted this feature. While not explicitly framed as anti-racist, it is likely to benefit Black people, who disproportionately experience police encounters.

There has also been innovation. **The College of Policing’s CoPilot** trial, which uses AI to scrutinise stop and search justifications, has the potential to enhance internal accountability – if guided by anti-racist principles and subject to independent evaluation. The trial is due to start in autumn 2025 across several forces. A **cluster randomised controlled trial** will assess its impact on supervisory effectiveness, productivity, and efficiency, with findings due by March 2026.

Despite being within scope for this workstream, there is no clear strategy guiding how new and emerging technologies such as Live Facial Recognition (LFR) and AI should be developed, used, and monitored through an anti-racist lens.

LFR, in particular, is already being rolled out by some forces despite long-standing public concern and evidence of racial bias. For example, in June 2024, legal action was launched by Shaun Thompson, a Black anti-knife crime activist, who was wrongly flagged by LFR and detained and questioned by the police.³⁵

Meanwhile, while BWV guidance has improved, compliance remains inconsistent.³⁶ Officers do not always activate cameras at key moments, and ethnicity data is still not recorded in full. This undermines both transparency and the ability to monitor for bias. It is not clear why officers fail to record ethnicity in some instances, something that could be subject of future research. Technological advances offer opportunities to strengthen the use of BWV, including automatic activation linked to specific equipment such as tasers or through command and control systems that remotely trigger BWV for all officers assigned to an incident.

Another option is permanent BWV recording for officers. Whilst this has been resisted in the UK, research from Brazil shows positive results in terms of reductions in use of force.³⁷ To ensure consistent adoption, legislative change may be needed, as relying on APP alone may not be sufficient to drive compliance.

To address these gaps, PRAP should develop and publish a formal anti-racist technology strategy covering tools like live facial recognition and AI. PRAP should also commit to regular independent impact assessments, and strengthen compliance on BWV use and accurate ethnicity data collection. This will need to be collected in the **Maturity Matrix**.

4 Stop and search

Stop and search remains one of the most visible and contested police powers in England and Wales, and one of the most disproportionate. Black people are significantly more likely to be stopped compared to their white peers.

In the year to March 2024, the most recent data available at the time of reporting, individuals identifying as Black British were searched at a rate 3.7X higher than those from a White ethnic group.³⁸

Over the past year, national leadership on stop and search has improved. The NPCC’s Stop and Search Lead and their colleagues are now working more closely with the PRAP team. We have also observed regular meetings between the Workstream 2 coordinator and NPCC leadership. The new quarterly National Delivery Group has also created regular space for updates, collaboration, and scrutiny. PRAP is a standing agenda item, and ISOB is in attendance at these updates.

³⁵ Matrix Chambers, *Challenge to the Met’s Use of Live Facial Recognition Technology* <https://www.matrixlaw.co.uk/news/challenge-to-the-mets-use-of-live-facial-recognition-technology/> [accessed 6 June 2025].

³⁶ BBC News, *Police officers widely misusing body-worn cameras*, (15 September 2023) <https://www.bbc.co.uk/news/uk-66809642> [accessed 30 May 2025].

³³ Geoff Pearson and Mike Rowe, ‘Gone Fishing: The Operation of Police Vehicle Stops in England and Wales’, *Criminology and Criminal Justice*, 25 February 2023, <https://doi.org/10.1177/17488958231155275> [accessed 21 May 2025].

³⁴ GOV.UK, *Road Traffic Act 1988, Section 163 (1988)* <https://www.legislation.gov.uk/ukpga/1988/52/section/163> [accessed 20 May 2025].

³⁸ GOV.UK, *Stop and search, arrests and mental health detentions, England and Wales, year ending March 2024* <https://www.gov.uk/government/statistics/stop-and-search-arrests-and-mental-health-detentions-march-2024> [accessed 21 May 2025].

In 2024, the NPCC developed a 'Plan on a Page' for stop and search, a national framework to reduce harm and tackle disparity. It identifies key issues that disproportionately affect Black people including **adultification**, routine handcuffing, and safeguarding failures. .

The College of Policing's stop and search guidance, APP, is scheduled to be updated and published in early 2026. This provides a further opportunity to embed anti-racism commitments in this area. Alongside this, there is active engagement with the Home Office on a potential change to PACE Code A that would remove the 'smell of cannabis' as a standalone justification for a search.³⁹ This is an important step. Research indicates that Black individuals are often stopped not due to evidence of cannabis use, but because of racial assumptions, such as being perceived as suspicious for driving an expensive car or walking through affluent areas. Officers then use the smell of cannabis to justify the stop, even when that was not the original reason.⁴⁰



NPCC Stop and Search Lead Andy Mariner's 'Plan on a Page' sets national priorities for tackling disproportionality and improving practice
(a larger version of this chart is available in Appendix 1)

College of Policing analysis of the Millennium Cohort Study on the impact of being stopped as a teenager has been completed, with a report anticipated later in 2025. This will add to the evidence base available to guide stop and search policy.⁴¹

However, changes to guidance and law only matter if they lead to different outcomes. To date, previous revisions have done little to improve the experience of Black individuals. Clear accountability is needed to ensure that any new standards are meaningfully implemented and evaluated.

Meanwhile, significant gaps remain in the ethnicity data collected on stop and search, making it harder to understand and address **racial disparity**.⁴² Closing these data gaps must be a priority to tackle **disproportionality** in this area.

Work is also underway to improve how drug searches are categorised, enabling clearer and more meaningful analysis. This is essential given that Black people are disproportionately targeted in drug searches, even though drug use rates are broadly similar across all ethnic groups.⁴³

5 British Transport Police

While national progress on stop and search remains uneven, some forces are showing what is possible with the right leadership and focus. The British Transport Police offers a strong example of how data transparency and accountability can help drive fairer policing, as highlighted in the IOPC's *Race Discrimination in Policing* report.⁴⁴

British Transport Police's use of force reports are scrutinised in public meetings of the Police Standards and Integrity Committee (PSIC), part of its Police Authority Board. These sessions are live streamed on YouTube, offering a rare level of public visibility. Each use of force is recorded digitally, monitored for patterns, and referred to both PSIC and the Independent Advisory and Scrutiny Group for review.

The British Transport Police has also made notable progress in closing the ethnicity data gap in stop and search. Supervisors now use a performance **Dashboard** that tracks individual officer activity, including whether they disproportionately stop Black people or have low outcome rates. This level of scrutiny is helping the force tighten data collection and address disparities.

Nationally, the rate of unreported ethnicity in stop and search rose from 5% to 20% between 2010 and 2023, but the British Transport Police has cut its own gap from 30% to 13% in just two years.⁴⁵



British Transport Police, data correct at May 2025

(a larger version of this chart is available in Appendix 1)

This kind of targeted effort should be adopted more widely. Forces should be required to eliminate ethnicity data gaps and use **The College of Policing's Practice Bank** to replicate what works and avoid what does not.

6 The Metropolitan Police

As the largest force in the country, responsible for over a third of all stop and searches in England and Wales, the Metropolitan Police plays an outsized role in shaping public trust in policing. Its action – or inaction – have national ripple effects, making its leadership on PRAP essential.⁴⁶

Over the past year, the Metropolitan Police has shown signs of improved engagement with the ISOB. Communications from the London Race Action Plan team have become more consistent, and the force has increased its attendance at meetings and events. This signals a welcome shift toward openness. However, questions remain about the substance behind that engagement. Too often, the focus appears to be on activity rather than meaningful change.

³⁹ GOV.UK, *Police and Criminal Evidence Act 1984 (PACE) Code A: 2023 (2023)* <https://assets.publishing.service.gov.uk/media/6580275e1c0c2a000d18cee3/PAACE+Code+A+2023.pdf> [accessed 20 May 2025].

⁴⁰ Sharon Grace, Charlie Lloyd, and Gary Page, 'What discretion do you need? Factors influencing police decision-making in possession of cannabis offences', *Criminology & Criminal Justice* (25 February 2023) <https://doi.org/10.1177/17488958221142478> [accessed 21 May 2025].

⁴¹ The UCL Centre for Longitudinal Studies Millennium Cohort Study <https://cls.ucl.ac.uk/cls-studies/millennium-cohort-study/> [accessed 4 July 2025].

⁴² GOV.UK, *Stop and Search* <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/stop-and-search/latest/> [accessed 6 June 2025].

⁴³ Michael Shiner, Zoe Carré, Rebekah Delsol and Niamh Eastwood, *The Colour of Injustice: 'Race', drugs and law enforcement in England and Wales* (London: Release, StopWatch and the International Drug Policy Unit, 2018) <https://www.release.org.uk/sites/default/files/pdf/publications/The%20Colour%20of%20Injustice.pdf> [accessed 30 May 2025].

⁴⁴ Independent Office for Police Conduct (IOPC), *Race discrimination in the police: A review of evidence (2022)* <https://www.policeconduct.gov.uk/race-discrimination-report> [accessed 21 May 2025].

⁴⁵ GOV.UK, *Stop and search (Ethnicity facts and figures)*, last updated 24 May 2023 <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/stop-and-search/latest/> [accessed 20 May 2025].

⁴⁶ GOV.UK, *Stop and search*.

A case in point is the Metropolitan Police's launch of a new Stop and Search Charter in February 2025.⁴⁷ The event was invitation-only. Although it was recorded, the ISOB's request to make the footage public was denied. This lack of transparency is disappointing.

The Charter itself fails to meaningfully grapple with race disparity. It acknowledges disproportionate use against ethnically minoritised groups only briefly, before pivoting to suggest that higher victimisation rates among those same groups justify increased police scrutiny. This framing glosses over the role of **institutional racism** and does little to inspire confidence that the Charter will drive real change.

A similar pattern emerged at a public taser awareness session in September 2024. While community members were present, the event focused heavily on justifying taser use rather than interrogating its disproportionate impact. The opportunity for critical dialogue was missed.

ISOB's concerns deepened further during a March 2025 visit to the Metropolitan Police's Central Uniform Scrutiny Panel (CUSP). The structure of the panel raises serious questions. There were no independent London residents present. All attendees were either Metropolitan Police officers, staff, or volunteers recruited by the force. The panel lacked racial **diversity** and skewed toward older participants, failing to reflect the city it serves. 46.2% of London residents identify as non-white⁴⁸, and the city has a notably high concentration of adults aged 25 to 34.⁴⁹

The scrutiny process itself was limited. Attendees reviewed unredacted BWV in small groups, but their feedback was restricted to binary outcomes: pass the video on with a note, or take no further action.

This is a step backwards from earlier traffic-light systems that allowed for more nuanced evaluations. Comments from panel members included references to officers being "trigger happy" or using tasers on individuals who posed no visible threat. Yet no formal referral mechanism existed to escalate these concerns.

This reflects broader problems with accountability. We observed barriers in CUSP accessing BWV and associated data. Some BWV was withheld without explanation. Without full and representative access to BWV and incident data, scrutiny efforts are undermined from the outset.

These limitations echo findings from the 2023 TASERD research, which noted inconsistencies between taser deployment and training standards.⁵⁰ The disconnect between doctrine and real-world practice remains a pressing issue.

If the Met is serious about rebuilding trust, it must go further than selective engagement and surface-level transparency. ISOB recommends opening CUSP membership to vetted, independent London residents and publicly sharing information about the panel's structure, processes, and outcomes. This is standard practice in some other forces. The Met should also create a dedicated public engagement forum on taser usage, reinstate a more robust evaluation framework for reviewing BWV footage, and introduce a formal referral mechanism to escalate concerns identified during taser scrutiny. The Met Police would benefit from following the lead of other forces, such as Avon & Somerset, who regularly publish detailed information about their scrutiny process for the use of taser and other police powers online.⁵¹

We understand that the Metropolitan Police's scrutiny system is undergoing revision which will shift ownership to the Mayor's Office for Policing and Crime ("MOPAC"). We hope this will drive the Metropolitan Police towards delivering the changes outlined above.

We also understand that the Metropolitan Police has initiated instruction of an anti-racism expert to review its approach to the London Race Action Plan and the "New Met for London" programmes' objectives of becoming an anti-racist organisation. That instruction is in its initial stages and we look forward to seeing how the reflections are received and embedded.

Without these changes, there is a risk that the Metropolitan Police continues to oversee itself, with limited public accountability and little assurance that power is being used fairly.



⁴⁷ Metropolitan Police Service, *Stop and Search Charter*, 27 February 2025 <https://news.met.police.uk/documents/stop-and-search-charter-dot-pdf-447192> [accessed 21 May 2025].

⁴⁸ GOV.UK, *Regional ethnic diversity* (Ethnicity facts and figures), last updated 10 August 2023 <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/regional-ethnic-diversity/latest/> [accessed 22 May 2025].

⁴⁹ Office for National Statistics (ONS), *TS007a Census 2021 – Age by five-year age bands*, 13 January 2023 <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/15432ts007acensus2021agebyfiveyearagebands> [accessed 22 May 2025].

⁵⁰ TASERD, *Taser and Social, Ethnic and Racial Disparities research programme* (Keele University, October 2023) <https://www.keele.ac.uk/media/k- web/k-research/kpac/taserd-report.pdf> [accessed 21 May 2025].

⁵¹ Avon & Somerset Police, *Independent Scrutiny of Police Powers Panel Reports (2017 – 2025)*, <https://www.avonandsomerset-pcc.gov.uk/reports-publications/scrutiny-police-powers-panel-reports/>

A large, light gray circle containing several concentric circles of varying shades of gray. In the center of this graphic, the number '06' is displayed in a bold, dark red font.

06

WORKSTREAM 3: TRUST AND RECONCILIATION

(Formerly Community Engagement
and Relations)

A horizontal bar at the bottom of the page, divided into three segments of different shades of gray: dark gray, medium gray, and light gray.

WORKSTREAM 3

Workstream 3 of PRAP focuses on strengthening police–community engagement as a core part of rebuilding trust and delivering on PRAP’s anti-racism commitments.

While originally titled *Community Engagement and Relations*, the workstream was later renamed *Trust and Reconciliation* to reflect the deeper, long-term challenge of repairing fractured relationships with Black communities across England and Wales.

This change in name and framing took place with consultation. However, there is a risk that the rationale behind the change has not been fully understood or reflected in the workstream’s delivery. Clarifying the intent behind this shift, and ensuring the workstream lives up to the ambition implied by its new title, will be critical in the year ahead.

Over the past year, progress has been uneven. While the workstream has produced national guidance and supported some strategic forums, it has made limited headway in supporting forces to build meaningful relationships with Black communities at a local level.

Looking ahead, the workstream needs to shift its focus from setting out principles to delivering practical, force-level action. Black communities expect more than dialogue – they expect to see change on the ground. To achieve this, forces must be supported with learning, investment, and clear accountability.

PROGRESS AGAINST PRAP ACTIONS

During the last year, the workstream reduced the scale of its planned activities and focused on three initiatives as follows:

1 Guidance on police transparency and engagement

The PRAP team and **The College of Policing** has developed new guidance on Police Transparency and Engagement, a draft of which was shared with stakeholders in January 2025 for feedback.

The principle behind this work is well founded. How the police engage with, and are accountable to, local communities is fundamental to the principle upon which British policing operates – policing with public consent. It is vital for the police to have the consent of all demographic groups. Yet it has been severely fractured when it comes to Black communities across the country.

However, guidance alone will not rebuild trust if it does not readily translate into meaningful action. The new guidance represents an opportunity for **The College of Policing** to introduce practical advice on how to involve communities in annual maturity assessments. From the feedback we have collated, internal and external stakeholders have identified a need for assistance with:

- **Identifying and sharing examples of good practice**, particularly in engaging with young Black people
- **Showing how they are making progress on anti-racism**, as measured by the PRAP **Maturity Matrix**
- **Demonstrating accountability** by involving communities in assessing that progress

2 Pilot for restorative justice and trauma-informed practice

This pilot has faced significant delays due to leadership changes, funding gaps, and recruitment challenges. Despite considerable effort by the workstream coordinator to engage forces, only one force enrolled and, unfortunately due to issues with personnel changes, had to withdraw. Work is underway to identify a replacement force. The lack of uptake is disappointing, particularly given that this is the workstream’s sole operational and practical intervention.

It is unclear what, if any, incentives were offered to encourage more forces to volunteer. We are also concerned that there has been no discernible reflection from the PRAP team on why efforts to expand the pilot did not succeed, or what could be learned from this experience.

Without this reflection and learning, there is a risk that this pilot becomes another example of good intentions not translating into wider impact. For future initiatives, PRAP needs to:

- Understand and address the barriers that stop forces from signing up.
- Provide clearer incentives for participation.
- Share learning transparently so that others can benefit, even if the pilot does not scale as intended.

We recommend the PRAP team capture and share the lessons from this pilot – both the successes and the challenges – so that future efforts to build trust with communities can be stronger and more effective.

3 Community engagement evaluation workshop

A national workshop, run by **The College of Policing** in March 2025, brought together around 30 police forces to explore evidence-based approaches to community engagement.

The session focused on helping forces build theories of change, identify the problems they are trying to solve, define the outcomes they want to achieve, and develop clear metrics to measure impact, especially in relation to race and ethnicity.

The session included a practical case study from South Wales, where police are testing intensive community engagement in three disadvantaged neighbourhoods. The project uses the Neighbourhood Alert platform to survey residents before and after engagement activities to assess their impact.

This kind of learning is exactly what PRAP should be tracking and sharing more widely. By monitoring what community engagement activity is happening at force level, PRAP can identify what works, scale good practice, and help forces learn from each other.

While the **Practice Bank**⁵² and Knowledge Hub⁵³ are promoted as tools to support this, it is unclear how widely they are being used. Since March 2023, 54 community engagement submissions have been published on the **Practice Bank**. However, there is no data on how often these resources are accessed or used in practice.

We encourage the PRAP team to review these platforms, gather user feedback, and publish data on their reach and impact. This will help ensure they deliver real value to forces and support better community engagement across the country.

⁵² College of Policing, *Practices* [accessed 20 May 2025].

⁵³ Created by the Police Digital Service, the Knowledge Hub is a secure online platform where police and public-sector organisations can share information, exchange ideas, and collaborate more effectively.

This workshop represents one example of PRAP's efforts to strengthen learning and evaluation in community engagement.

While it was a constructive step forward, there are opportunities to build on this foundation and strengthen the impact of future sessions.

One key limitation was the absence of community voices. The workshop involved only police representatives, missing an opportunity to include community groups and experts whose insights would have added value and helped build trust through shared learning.

We encourage the PRAP team and *The College of Policing* to follow up with forces and publish learning from the workshop, including examples of what is working in practice.

4 National Community Reference Group (NCRG)

We have provided wider reflections on the role, challenges, and future potential of the **NCRG** earlier in this report. This section focuses specifically on how the **NCRG** fits within Workstream 3.

Using their expertise, professional skills, and lived experience, this group of external civilian stakeholders operates as a strategic forum, providing guidance, feedback, and advice on PRAP. While its creation is welcome, its placement within Workstream 3 appears to be more about convenience rather than clear strategy.

The **NCRG** was created to strengthen national engagement with community and **civil society organisations**. However, its role does not extend to improving *how* individual forces engage with Black communities at the local level – the core purpose of Workstream 3. This misalignment has never been explained.

Although the **NCRG** is positioned as a community engagement mechanism, it operates at a distance from local policing. As noted earlier in this report, its focus has been on national issues rather than local force-level gaps. As a result, it has not addressed the specific shortcomings in local engagement that this workstream is intended to close.

PRAP must now prioritise more localised, grassroots engagement. In parallel, PRAP should also actively promote peer-to-peer knowledge exchange between forces, helping to spread practical ideas and fresh examples of how forces can meaningfully involve Black communities in their work.





07

WORKSTREAM 4: SAFETY AND VICTIMISATION

(Formerly Protection and Justice)

WORKSTREAM 4

Black communities experience the double harm of being more likely to be victims of crime while receiving less protection and justice from policing.

According to a poll by Crest Advisory



of Black adults said they do not believe they receive the service or protection that need from the police.⁵⁴

This is the gap Workstream 4 was created to close. It sets out PRAP's commitment to build a police service that safeguards Black communities and takes their safety seriously.

Over the past year, we have seen some progress, including efforts to explore new approaches and build understanding of specific issues like **adulthood**. However, despite some activity, the overall impact has been limited. Delivery has not matched the scale or urgency of the challenge, with most work remaining at the pilot or planning stage.

The data needed to drive meaningful action has still not been collected. The benchmarks and metrics needed to track progress have not been established. Without these basics in place, PRAP's commitment risks becoming yet another promise without delivery.

To deliver the change Black communities expect and deserve, Workstream 4 needs sharper focus, stronger leadership, and a shift from planning to delivery. Below we reflect on the key activities undertaken so far.

PROGRESS AGAINST PRAP ACTIONS

1 Professional Conversations

Professional Conversations is a 12-month mentoring scheme, piloted from November 2023 to November 2024, pairing white chief officers (as mentees) with Black executives (as mentors). Backed by **The College of Policing** and the NPCC through PRAP, the scheme aims to build more diverse networks, deepen chief officers' understanding of Black lived experience, and give Black leaders greater insight into policing.

The pilot launched with six mentoring partnerships involving 12 participants, using a highly selective recruitment model. However, due to scheduling conflicts, participant withdrawals, and the planning demands of the scheme, it ran in practice with just four active pairings. While the selective recruitment strategy had merit, the reduced scale limited the scheme's learning potential and credibility as a model for wider rollout.

This risk appears to have materialised. Although the pilot has been completed and evaluation is underway, we have been informed that it is unlikely to progress to a national rollout. While the evaluation has not been published, the findings have been shared with the ISOB. We understand that the College intends to add a report of pilot to the National Police Library.

Efforts to capture learning through reflective diaries fell short, with most participants failing to complete them despite repeated encouragement. We stressed that structured reflection is a vital part of leadership accountability, and future versions must use stronger methods, such as facilitated check-ins or group debriefs, to capture meaningful learning.

We were also concerned about the lack of clarity in the pilot's objectives and the limited buy-in across policing. Its placement in Workstream 4 felt misaligned, and we believe it would have been better suited to Workstream 1 (Culture and Workforce) or Workstream 3 (Trust and Reconciliation), with a stronger leadership and engagement focus.

To deliver real value, any future version of this work must be:

- Clear in its objectives and level of impact
- Broader in its reach
- Stronger in its evaluation methods
- Owned and driven by police leadership

Without these improvements, there is a real risk that Professional Conversations will be seen as a missed opportunity, rather than a meaningful step forward in improving leadership engagement with Black communities.

2 Adulthood

Since the strip search of Child Q five years ago, the issue of **adulthood** bias, where Black children are wrongly treated as older or more dangerous than they are, has gained greater public attention.⁵⁵



Safeguarding children from Black, Asian and minoritised ethnic communities

“

“Adulthood bias is a form of bias where children from Black, Asian and minority ethnic communities are perceived as being more ‘streetwise’, more ‘grown up’, less innocent and less vulnerable than other children. This particularly affects Black children, who might be viewed primarily as a threat rather than as a child who needs support (Davis and Marsh, 2020; Georgetown Law Center on Poverty and Inequality, 2019). Children who have been adulthified might also be perceived as having more understanding of their actions and the consequences of their actions.”

NSPCC, 2022

“

“Any action plan that seeks to address race in policing must acknowledge how age compounds racial bias, leading to distinct harms that neither race-focused nor child-focused strategies can resolve alone. PRAP must work to bridge this gap.”

– Just for Kids Law, including the Children's Rights Alliance for England –

⁵⁴ Amber Evans, Patrick Olajide, and Jon Clements, *Crime, Policing and Stop and Search: Black Perspectives in Context* (London: Crest Advisory, November 2022) https://64e09bbc-abdd-42c6-90a8-58992ce46e59.usfziles.com/ugd/64e09b_9b1fcbf31faf478db21e05fb34bd73b8.pdf [accessed 20 May 2025].

⁵⁵ City and Hackney Safeguarding Children Partnership (CHSCP), *Local Child Safeguarding Practice Review – Child Q*, (14 March 2022) <https://chscp.org.uk/wp-content/uploads/2022/03/Child-Q-PUBLISHED-14-March-22.pdf> [accessed 20 May 2025].

⁵⁶ NSPCC, *Safeguarding children from Black, Asian and minoritised ethnic communities* (2022) <https://learning.nspcc.org.uk/safeguarding-child-protection/children-from-black-asian-minoritised-ethnic-communities> [accessed 20 May 2025].

The College of Policing's rapid evidence assessment of **adultification** in policing, launched in January 2024. It is a step towards addressing this gap particularly in relation to Black children from low-income backgrounds.⁵⁷ The review's findings are due to be published later this year.

However, understanding the problem is an initial step. The real test will be whether policing turns this understanding into real change. This means taking concrete action to:

- Identify where **adultification** occurs
- Interrupt harmful practices
- Embed preventative actions across all forces

Engaging key organisations with expertise in this area will be paramount at this stage.

We recommend the findings be formally integrated into the **Maturity Matrix** as a marker of progress on race **equity**. Forces should also be supported to translate the findings into action by embedding them in training and development, operational policies, and frontline guidance.

3 Authorised Professional Practice Guidance

Over the past year, PRAP has supported efforts to update several key areas of **APP**, including Mental Health, Missing Persons, Hate Crime, and Domestic Abuse. These updates aim to better reflect the experiences of vulnerable Black people and improve the way policing responds to them.

However, rather than conducting full reviews and meaningful revisions, the work focused on light-touch updates and minor tweaks. This was explained to be a practical decision, based on the time and resource demands of more in-depth revision processes.

While we understand the reasoning behind this decision, it was a missed opportunity to address deeper, systemic challenges and make more meaningful changes that could strengthen outcomes for Black communities.

Future revisions must be bolder, more inclusive, and more ambitious. Policing must be willing to invest the time and leadership needed to make APP a tool for real change, not just technical compliance. Significantly, organisations with subject matter expertise should have meaningful input into any such revisions.

4 Data-driven approaches to understanding the impact of crime on Black communities

One of the key aims of Workstream 4 is to build a better understanding of how crime affects Black communities, using data to identify patterns, target resources, and improve outcomes. However, this has not yet been achieved.

Poor data collection practices across police forces continue to undermine progress. Despite this being raised in previous ISOB reports and flagged by **HMICFRS**, the quality of ethnicity data remains inconsistent and incomplete.⁵⁸ Without this data, it is impossible to assess whether Black people are being adequately protected, or to understand the full impact of crime on Black communities.

NPCC analysis (not yet published) indicates that for PRAP workstream 4 areas alone, there is a significant data gap around ethnicity recording. Three fiscal years were requested with the following information shared:

- **2018/2019: 38.2% missing/not recorded**
- **2022/2023: 40.4% missing/not recorded**
- **2023/2024: 40.4% missing/not recorded**

⁵⁷ College of Policing, *Adultification: Evidence Review* (n.d.) <https://www.college.police.uk/research/projects/adultification-evidence-review> [accessed 20 May 2025].

⁵⁸ His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), *An inspection of how well the police and criminal justice system understand, communicate and respond to race disparity* (2023) <https://hmicfrs.justiceinspectorates.gov.uk/publications/inspection-of-race-disparity-in-police-criminal-justice-decision-making/> [accessed 20 May 2025].

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“It is crucial that more easily accessible data is consistently available across different uses of police powers. Combined data is vital to evaluate whether reforms are having a tangible impact amongst specific groups of children. Data must be disaggregated by age and ethnicity characteristics combined, and other relevant factors, namely, gender, SEND and mental health, and these must be published regularly. Without this level of transparency, it is difficult to understand which children are affected, the scale of issues facing children or identify trends that require action.”

– Just for Kids Law, including the Children's Rights Alliance for England –

Looking ahead, policing must:

- Set clear national standards for recording ethnicity data
- Provide training and support to improve data quality
- Monitor force-level performance on data collection
- Use data to inform action and measure progress

Currently, there is no incentive for forces to improve the way they collect and use data, and it remains unclear what action the NPCC is taking to prioritise this work.

From the start, Workstream 4 has struggled with a lack of clear focus. Despite the time that has passed, the senior leadership team has not done enough to identify and embed practical actions that would improve safety and justice for Black communities.

This lack of innovation, leadership, and follow-through has held the workstream back. As a result, it has missed opportunities to deliver the kind of concrete, community-focused action that could make a real difference, particularly for Black children, women, and girls.

5 Enhancing performance metrics and accountability

Workstream 4's progress is difficult to assess because there are still no clear performance metrics or public reporting on outcomes. While planning activity has continued, there is little visibility of what has actually changed or improved for Black communities as a result.

We have consistently highlighted the need for better tracking and measurement. Without this, it is impossible to know whether the workstream is meeting its aims or making a real difference.

At present, the balance remains too focused on planning over delivery. While planning is important, it must be matched with clear evidence of progress and impact. Continuing without this balance risks undermining confidence in the workstream's effectiveness.

To move forward, Workstream 4 needs to embed clear performance metrics that connect to the Maturity Matrix and use data and evidence to strengthen accountability and inform future action



08

ISOB RECOMMENDATIONS OVER THE YEARS



Since its establishment in 2022, the Independent Scrutiny and Oversight Board (ISOB) – **tasked with holding policing to account on the delivery of PRAP** – has consistently challenged the Programme to move beyond words and towards meaningful, measurable change.

Across our annual reports, the ISOB has set out clear recommendations focused on improving policing's transparency, and ability to build trust and drive better outcomes for Black communities. This section brings together those recommendations from 2023 and 2024 to show what has been asked of policing so far, and where further action is still needed. It is intended to provide additional context to our 2025 recommendations and reinforce the consistent calls for more decisive leadership, clearer accountability, and deeper engagement across the PRAP.

| 2023 Reporting on PRAP activity from May 2022 to May 2023⁵⁹ | 2024 Reporting on PRAP activity from May 2023 to May 2024⁶⁰ |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> 1. Restructure the PRAP Redesign the programme's structure to reflect the values of anti-racism, reduce hierarchy, and support progression for those delivering the work. 2. Introduce tangible and measurable performance metrics Embed clear, public-facing success measures to track progress and hold forces accountable. 3. Identify clear areas of focus Strengthen PRAP's emphasis on key issues such as stop and search, misconduct, and intersectionality. 4. Increase engagement with external stakeholders Prioritise meaningful consultation with Black communities, civil society organisations, and anti-racism experts throughout delivery. 5. Develop and deliver a national communication strategy Create regular, accessible updates on PRAP's activity and outcomes to ensure transparency and public awareness. 6. Improve the flow of information to ISOB Ensure consistent, open sharing of insights from national teams and local forces to strengthen scrutiny and oversight. 7. Provide adequate resourcing to the plan Secure the staff, skills, and funding needed for effective delivery – especially for workstream coordinators and seconded roles. | <ol style="list-style-type: none"> 1. Central Government leadership⁶¹ The Home Office must take formal responsibility for PRAP – setting direction, funding delivery, and coordinating national oversight. Our 2024 Annual Feedback Report focused on advancing three core recommendations that were fully accepted by PRAP in 2023. 2. Introduce tangible and measurable performance metrics Introduce tangible and measurable performance metrics for assessing PRAP delivery and impact. Develop a comprehensive framework to assess force-level progress on anti-racism, including success metrics and tracking mechanisms. 3. Identify clear areas of focus Identify clear and focused priority areas to ensure concentrated effort and visible progress 4. Increase engagement with external stakeholders Increase meaningful engagement with external stakeholders, particularly civil society organisations. Improve public and internal understanding of PRAP's aims, structure, and requirements. |

⁵⁹ ISOB, *Police Race Action Plan: Independent Scrutiny and Oversight Board Annual Report, May 2022–May 2023* (August 2023) https://www.policeisob.co.uk/files/ugd/9e3577_512873be247a42bb878b5a2febbba7bf6.pdf [accessed 22 May 2025].

⁶⁰ ISOB, *Police Race Action Plan: Independent Scrutiny and Oversight Board Annual Feedback Report, May 2023–May 2024* (August 2024) https://www.policeisob.co.uk/files/ugd/9e3577_53116603510b4d3784de5d4ca921fe01.pdf [accessed 22 May 2025].

⁶¹ ISOB, *Police Race Action Plan: Independent Scrutiny and Oversight Board Annual Feedback Report, May 2023–May 2024 – Executive Summary* (August 2024) https://www.policeisob.co.uk/files/ugd/9e3577_83a8f69556784da0bc5961b03ed9859f.pdf [accessed 22 May 2025].

A decorative graphic on the right side of the page. It features a large white circle containing several concentric light gray circles. In the center of these circles is a solid gray circle with the number '09' written in a dark red, serif font.

09

GLOSSARY

Adultification – The biased perception of Black children as older, more responsible, or less innocent than their peers. This can result in reduced safeguarding and harsher treatment by police and other institutions.

Annual Data Requirement (ADR) – A formal list of data that all police forces in England and Wales are required to submit under the Home Secretary’s statutory powers. It includes key policing and crime statistics.

Authorised Professional Practice (APP) – APP is national guidance for policing in England and Wales, setting out the actions officers and staff should take to ensure a consistent and effective service to the public. It covers specific areas of policing such as mental health, roads policing, and civil emergencies, and is designed to support professional decision-making across forces.

Baroness Casey Review – An independent investigation into the culture and behaviour of the Metropolitan Police, led by Baroness Louise Casey. Published in March 2023, it found evidence of institutional racism, sexism, and homophobia.

Benchmarking – Evaluating something by comparing it against an established standard or best practice.

Black History Education Modules – A set of learning resources developed by the College of Policing to improve police understanding of the historical relationship between policing and Black communities in the UK.

Body Worn Video – A form of mobile video/audio recording technology used by police officers. Updates to national guidance now include a 30-second pre-recording feature to improve accountability.

Chief Constables’ Council – The Chief Constables’ Council is the top decision-making body for the National Police Chiefs’ Council (NPCC) in the UK, comprising Chief Constables from various police forces, including territorial forces, British Transport Police, Ministry of Defence Police, Civil Nuclear Constabulary, National Crime Agency, and College of Policing. The Council serves as a forum for discussing operational policing issues and establishing national standards and approaches.

Civil society organisation – According to the World Bank, civil society refers to “a wide array of organisations: community groups, non-governmental organizations [NGOs], labour unions, indigenous groups, charitable organizations, faith-based organizations, professional associations, and foundations.”

Cluster randomised controlled trial – A cluster randomised controlled trial (or cluster RCT) is a type of study used to test whether something – like a new tool, treatment, or training – actually works. Instead of testing it on individuals one by one, the trial tests it on groups (or “clusters”), such as families, schools or even entire cities.

College of Policing – The College of Policing (CoP or “the College”) is a professional body for everyone working across policing. It is an operationally independent non-departmental public body.

Dashboard – A visual reporting tool used by police forces to track key performance indicators (KPIs) and monitor disparity data such as stop and search or use of force.

Direct discrimination – Treating someone less favourably because of a protected characteristic such as race, religion, or gender.

Disproportionality – When a group is impacted by police powers (e.g. stop and search, use of force) at a rate higher than their representation in the general population.

Diversity – The presence of differences within a given setting, typically referring to race, ethnicity, gender, age, disability, and other demographics.

Equality – Providing the same resources or opportunities to individuals or groups

Equity – Recognising different needs and circumstances, and allocating resources to ensure fair outcomes.

Evidence & evaluation – The process of gathering data, assessing outcomes, and measuring the impact of policies and initiatives across policing.

HMICFRS – His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services. It oversees, inspects, and reports on the effectiveness and efficiency of policing in England and Wales.

Independent Advisory Groups (IAGs) – Groups of local community members who advise police forces on how their work is perceived and how to improve policing in their area.

Inclusion – Creating a culture where all individuals feel respected, valued, and able to contribute fully.

Indirect discrimination – When a policy that applies to everyone disproportionately disadvantages people with a protected characteristic.

Institutional racism – The collective failure of an organisation to provide fair and professional services to people because of their race, colour, culture, or ethnicity. This may be visible in attitudes, processes, or outcomes.

Intersectionality – A way of understanding how different aspects of a person’s identity (e.g. race, gender, class) combine to create unique experiences of discrimination or privilege.

The Independent Office for Police Conduct (IOPC) – An independent body which oversees the police complaints system in England and Wales and investigates serious misconduct.

Key Performance Indicators (KPIs) – Measures used by police forces to track their progress against objectives – e.g. reducing use of force, improving representation, or increasing public trust.

Leading Inclusive Teams – A PRAP initiative aimed at improving the leadership skills of police supervisors so they can positively shape organisational culture and support inclusion.

Local Race Action Plans (LRAPs) – Locally developed plans by individual police forces in England and Wales that align with the national PRAP.

Maturity Matrix – A national self-assessment tool used by police forces to evaluate their progress against anti-racism commitments. Forces are expected to evidence change across multiple dimensions.

National Black Police Association (NBPA) – Established in 1998, the NBPA is a national umbrella body representing Black Police Associations from across UK forces. It works to improve the working environment for Black officers and staff, influence national policy on race equality, and strengthen trust between policing and Black communities. Its membership includes local BPAs from across England and Wales, with around 5,000 officers, staff, and civil servants represented.

National Community Reference Group (NCRG) – A national group of independent civilian stakeholders providing strategic advice to PRAP on community engagement. Its aim is to ensure PRAP reflects community insight and lived experience.

National Police Chiefs' Council (NPCC) – Brings together senior police leaders in the UK to set direction and strategy across policing.

National Workforce Data Team – The team responsible for collecting workforce data from police forces across England and Wales, including diversity, vetting, and misconduct information.

Police and Crime Commissioners – Elected officials responsible for overseeing local police forces and holding Chief Constables to account.

PEEL Assessments – Police effectiveness, efficiency, and legitimacy (PEEL) assessments are independent reviews of police forces in England and Wales, carried out by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). They examine how effective, efficient and fair each force is, using inspections, data and professional judgment. Forces are graded from outstanding to inadequate, giving the public a clear picture of policing performance.

Practice Bank – A shared collection of real-world examples, guidance, and tools, hosted by the College of Policing, designed to help forces adopt effective or promising approaches to policing challenges.

Programme Board/Race Action Programme – The programme team responsible for delivering the national Police Race Action Plan.

Public and Personal Safety Training (PPST) – PPST is mandatory training provided to police officers, special constables, and police staff to ensure they are equipped to manage violent or potentially violent situations safely. Under the Health and Safety at Work Act 1974 and the Police (Health and Safety) Act 1997, police forces have a legal duty to provide appropriate information, instruction, training, and supervision to protect their employees. Failing to meet these obligations can constitute a criminal offence.

Racial Disparity – Differences in outcomes between racial or ethnic groups, often reflecting underlying structural or systemic inequalities. In policing, this includes, but is not limited to, disparities in stop and search, use of force, and workforce progression.

Racism – Actions, behaviours, or systems that advantage or disadvantage individuals based on their race, ethnicity, or cultural identity.

Restorative Justice – An approach focused on repairing harm and rebuilding trust through dialogue between affected communities and the police.

Section 60 Super Complaint – In 2021, the Criminal Justice Alliance (CJA) submitted a super-complaint in calling for the repeal of Section 60 of the Criminal Justice and Public Order Act 1994, a power that allows police to stop and search people without reasonable suspicion in designated areas. The complaint was submitted to HMICFRS, and argued that Section 60 disproportionately impacts Black communities, worsens trust in policing, and is less effective than other stop and search powers. While HMICFRS did not accept the central case for repeal, their inquiry recommended stronger adherence to legal and voluntary safeguards around Section 60. The CJA continues to work with HMICFRS on these improvements.

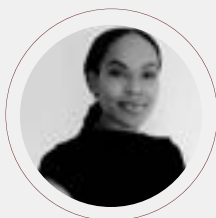
Trauma-Informed Practice – An approach that recognises the impact of trauma and integrates that understanding into policies, procedures, and everyday policing.

Vetting – The process of assessing the suitability of police officers and staff to hold their positions, including during recruitment and re-vetting cycles.

ABOUT THE INDEPENDENT SCRUTINY AND OVERSIGHT BOARD (ISOB)

The Independent Scrutiny and Oversight Board (ISOB) exists to provide overview and external scrutiny of the Police's Plan of Action.

The focus of the Plan is on the experiences and concerns of Black people due to the starkness of the racial disparities present in policing's interactions with Black communities.



**ABIMBOLA
JOHNSON**
Chair

Abimbola Johnson is an award-winning human rights barrister who practises from Doughty Street Chambers. She was called to the Bar by the Inner Temple in 2011. Abimbola is also a legal commentator featuring across most mainstream news outlets. Her academic writing appears on the reading list for the LSE's LLB(Hons) course she delivers an annual seminar on Hate Crime and Discrimination as part of Oxford University's Advanced Criminal Law undergraduate module, and she is a member of the Criminal Law Review's editorial board.



COLIN DOUGLAS
WS1; WS3

Strategic communications and marketing specialist.

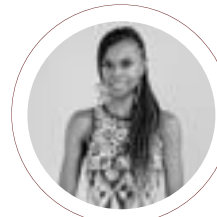
Colin's clients have included the Equality and Human Rights Commission, Financial Ombudsman Service, Charity Commission and the Government Commercial Function based in the Cabinet Office.



NICK GLYNN
WS2

Commentator, activist and independent policy consultant, specialising in policing, criminal justice, anti-racism and drug policy reform, working across Western Europe.

Previously led Police reform portfolio as a grantmaker at Open Society Foundations.



KATRINA FRENCH
WS3; WS4

Founding Director of UNJUST UK, Katrina is on a mission to address racially discriminatory policies, practices and culture. UNJUST is focused on reimagining policing and the criminal legal system, promoting public safety and empowering the public to be agents of change.



RACHEAL GRANT
*Data & Evidence;
WS4*

A data scientist who has worked in the industry for the last nine years, predominantly within the public sector, supporting the Home Office, The Ministry of Defence and the Ministry of Justice, reporting and advising on sensitive high security data.



RAM JOSHI
*Data & Evidence;
WS1, WS2*

Experienced policy professional with an excellent track record of leading the delivery of public policy initiatives. Ram is a senior leader in the Civil Service, and also has experience of working in financial services regulation.

APPENDIX 1

A decorative graphic consisting of multiple concentric circles, rendered in a light gray color, positioned on the right side of the page and partially overlapping the text 'APPENDIX 1'.

Chart from page 21: Preventable Deaths Tracker Platform

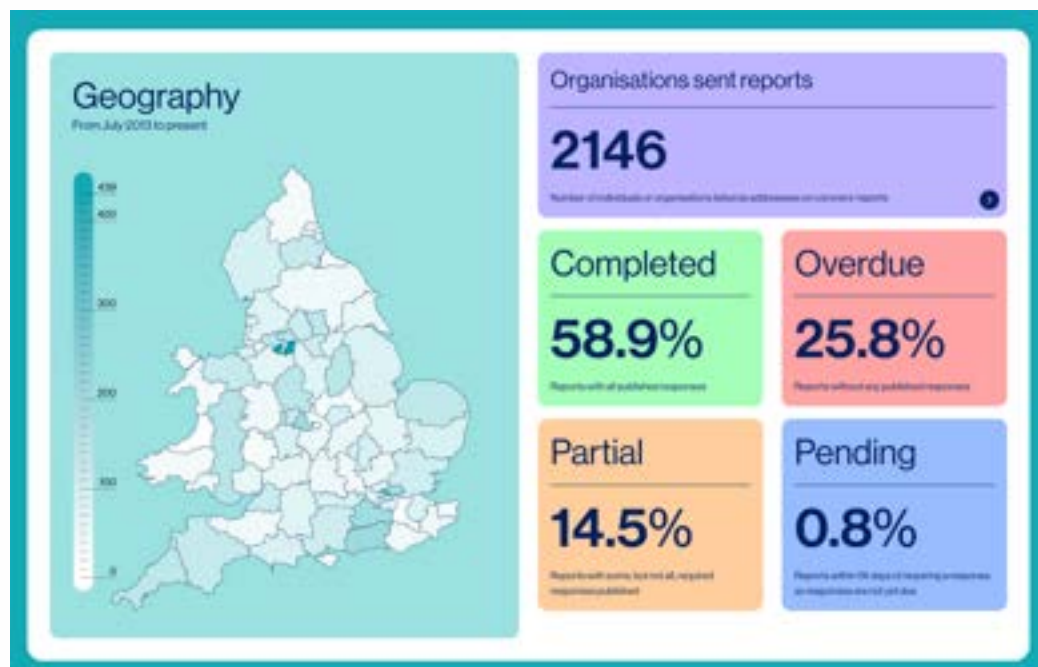
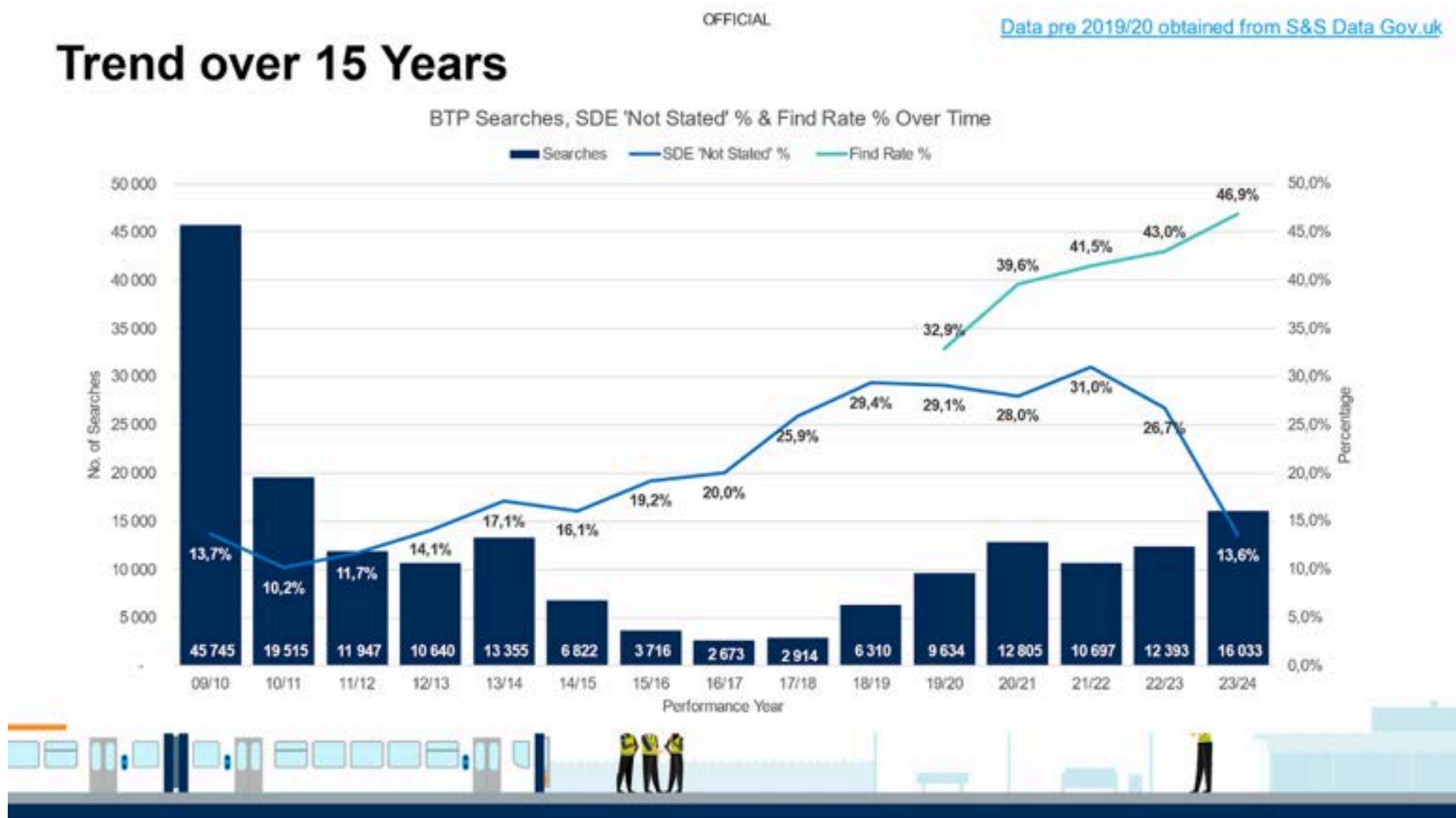


Chart from page 56: Stop and Search: Plan on a Page



NPCC Stop and Search Lead Andy Mariner's 'Plan on a Page' sets national priorities for tackling disproportionality and improving practice

Chart from page 57: British Transport Police Searches





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