



EQUALITY COMMISSION FOR NORTHERN IRELAND

Response to Consultation:

NIPB: Draft Policing Plan 2025-2030 Consultation Document

December 2024

Table of Contents

1	GENERAL COMMENTS	1
	CROSS-CUTTING POLICY RECOMMENDATIONS	2
	SECTION 75.....	3
2	POLICING PLAN OUTCOMES	3
	PSNI IS VICTIM FOCUSED	3
	<i>Domestic Abuse</i>	4
	<i>Hate Crime</i>	5
	<i>UNCRPD</i>	8
	WE HAVE SAFE AND ENGAGED COMMUNITIES WITH CONFIDENCE IN POLICING	9
	PSNI HAVE A REPRESENTATIVE, VALUED AND ENABLED WORKFORCE	14
3	MONITORING	16
4	CONCLUSION	18

Executive Summary

- i. The Commission welcomes the opportunity to respond to the Northern Ireland Policing Board's consultation on the Policing Plan 2025-2030.
- ii. We recommend that public policy and service provision should meet the specific needs of Northern Ireland, reflect international human rights standards and take account of best practice, including any lessons from Great Britain, Ireland or wider relevant jurisdictions. Provision should consider the needs of specific equality groups, including any relevant barriers and enablers.
- iii. The Commission has a number of cross-cutting recommendations that it considers important to see implemented across a range of Government strategies, programmes and plans. These include actions calling for leadership at all levels on equality issues; and recommending stakeholder involvement in design, delivery and review, the targeting of interventions and tracking of impacts; that key datasets contain more comprehensive equality data to facilitate full equality analysis; and to time-bound and resourced action plans, with stakeholder organisations so they can support individuals, organisations, and Government / Departments to shape and assist effective delivery.
- iv. We have also highlighted a range of other public policy recommendations in response to the consultation, including:
 - Guidance and training for criminal justice agencies, including the PSNI, which should include training on equality rights, awareness of the particular needs of equality groups, and on tackling prejudicial attitudes;
 - Ensuring support for victims of hate crime, and addressing the under-reporting of hate crime; and
 - Taking a gender specific (non-gender neutral) approach to tackling the specific nature and impact of domestic violence on women and men, including issues faced by those with specific multiple identities

1 General comments

- 1.1 The Equality Commission for Northern Ireland ('the Commission') is an independent public body established under the Northern Ireland Act 1998¹.
- 1.2 The Commission welcomes the opportunity to respond to the Northern Ireland Policing Board (NIPB) consultation on the Policing Plan 2025-2030. In general, we would welcome any potential contribution that the Plan can make to furthering equality and avoiding the emergence or widening of inequality.
- 1.3 In general, we **recommend that public policy and service provision should meet the specific needs of Northern Ireland, reflect international human rights standards and take account of best practice**, including any lessons from Great Britain, Ireland or wider relevant jurisdictions. Provision should consider the needs of specific equality groups, including any relevant barriers and enablers.
- 1.4 The Commission's existing public policy positions in this area have often related to hate crime, and domestic abuse. However, the recommendations we have made in relation to these issues may be relevant to victims of other crimes, and should be considered in that context.
- 1.5 NIPB will also wish to consider the Commission's Communities are Welcoming and Inclusive: Summary Report², which includes data relating to equality of opportunity within the criminal justice system and within communities when people experience and access justice matters.
- 1.6 We note that the draft Policing Plan is currently high-level, which makes it difficult to comment on its effectiveness. We note the intention to publish an Annual Performance Plan, which will set out how the Plan will be carried out.
- 1.7 **NIPB will wish to consider other relevant Strategies and Action Plans.** For instance, there is no reference to the draft PSNI Race and Ethnicity Action Plan, which is currently being

¹ For further information, see www.equalityni.org/AboutUs

² ECNI (2024) [Commission Statement on Equality in Northern Ireland Communities are Welcoming and Inclusive: Summary Report](#)

consulted on³. Likewise, NIPB will wish to consider relevant work being taken forward by Government Departments, including the Victims and Witness Strategy, the Domestic and Sexual Abuse Strategy, and the Strategic Framework to End Violence Against Women and Girls.

Cross-cutting Policy Recommendations

1.8 There is need for action to address a number of recommendations that the Commission considers important to see implemented across a range of Government strategies, programmes and plans:

- **Targeting Interventions, Tracking Impacts:** We recommend that all key measures are not only tracked in aggregate, but also for the impact on individuals from across the full range of equality grounds. Including comprehensive equality metrics will facilitate the targeting and delivery of interventions across the full range of equality groups.
- **Equality Data:** Improving the collection and sharing of comprehensive equality data will better underpin the targeting and tracking of equality impacts. Key datasets should contain comprehensive equality data to facilitate full equality analysis. Making such information more accessible will assist a wide range of decision makers and stakeholders.
- **Leadership:** Leadership should promote positive attitudes, challenge stereotypes and discrimination and ensure that options to advance equality are considered at the earliest point and across the lifecycle of law, public policy and service delivery.
- **Stakeholder Involvement:** We recommend full and routine stakeholder involvement and co-design. To benefit from their expertise and experience, key stakeholders from across the equality grounds should be fully involved in the design, delivery and review of law, public policy and service delivery.
- **Implementation Friendly Design:** When drafting policy and legislation, it is important to consider and

³ PSNI (2024) [Race and Ethnicity Action Plan 2025 - 2027 Consultation](#)

provide for implementation – including via prioritised, measurable, time-bound and resourced actions.

- **Resources:** Appropriate and sufficient resourcing is a key element of successful implementation. The Equality Commission and/or stakeholder organisations should be appropriately resourced to support individuals, organisations, and/or Government / Departments as relevant.

Section 75

- 1.9 This response primarily relates to the Commission’s public policy recommendations.
- 1.10 We are also available to provide advice in relation to Section 75 requirements. Public Authorities in carrying out their functions relating to Northern Ireland are required by Section 75 statutory duties to have due regard to the need to promote equality of opportunity between the nine equality categories and have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 1.11 It is important that Public Authorities use the assessment of policies for impact on equality of opportunity, including screening and equality impact assessments, as part of their development process, rather than as an afterthought when the policy has been established.

2 Policing Plan Outcomes

PSNI is Victim Focused

- 2.1 We **recommend that actions are targeted appropriately to meet the specific needs and address barriers** across the range of equality grounds. It is important to note that the experience of a person facing multiple inequalities is different from those facing inequality on a single ground.
- 2.2 As above, the Commission **recommends full and routine stakeholder involvement and co-design**. Government and Public Authorities should fully and routinely involve key

stakeholders in the design, delivery and review of law, public policy and service delivery, so as to benefit from their expertise and experience.

- 2.3 The below exemplifies some specific areas where the Commission has previously made comment, or has relevant research. NIPB will wish to consider how such issues may be relevant to wider victims, informed by engagement with groups from across the equality grounds.

Domestic Abuse

- 2.4 As above, the Commission has recommended⁴ a **gender specific (non-gender neutral) approach to tackling the specific nature and impact of domestic violence on women and men**, including issues faced by those with specific multiple identities.
- 2.5 We have also recommended⁵ steps, including through the delivery of effective strategies, to tackle the nature and specific impact of gender based violence on women and men and due to a person's gender identity; to tackle cultural and stereotypical attitudes, including through education, aimed at raising awareness of, and tackling, gender based violence; and to ensure effective resources and services for those who are subject to gender based violence.
- 2.6 Such resources and services should reflect the needs of those from across the equality grounds. For instance, our commissioned research report on the Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland highlighted the experiences of some migrant women including cases whereby all household documentation was in a male partner's name. This could be particularly problematic for women experiencing domestic abuse who may not have access to documents and therefore lack the ability to submit their own immigration applications⁶.
- 2.7 The Commission has previously highlighted that victims of domestic and sexual violence, mainly minority ethnic women, can be left financially dependent on their abuser, whether partner, other family member, employer or trafficker. We have

⁴ ECNI (2016) [Gender Equality: Policy Priorities and Recommendations](#), para 10.17.

⁵ ECNI (2016) [Gender Equality: Policy Priorities and Recommendations](#), para 10.17.

⁶ ECNI (2023) [Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#), p.72.

recommended improved access to social protection, including for the subjected to domestic violence with no recourse to public funds⁷.

- 2.8 We have previously highlighted that the **PSNI does not publish data on the levels of domestic abuse incidents/crimes by disability, sexual orientation or gender identity**, despite publishing equality-related statistics in relation to hate crime. The collection and publication of the levels of domestic violence experienced, for example, by disabled people in Northern Ireland, would assist in monitoring trends in disability domestic violence incidents and crimes.
- 2.9 Further to the above, in our response to the Department of Justice's consultation on the **Domestic and Sexual Abuse Strategy⁸**, the Commission highlighted some of the particular issues faced by different equality groups, including men and women, LGBT+ people, disabled people, those of different ages and people from minority ethnic communities. Although these points are particularly relevant to domestic and sexual abuse, **the NIPB may benefit from also considering our response to that consultation.**
- 2.10 NIPB will also wish to consider research undertaken by other organisations. For example, TEO has commissioned a range of research⁹ relating to the VAWG Strategic Framework, and the Commissioner Designate for Victims of Crime has recently published research¹⁰ on Male Experiences of Intimate Partner Violence.

Hate Crime

- 2.11 The Commission has previously recommended¹¹ **additional action to support victims of hate crime**, including by providing additional support to vulnerable victims; and improving measurement of victim's satisfaction levels with services.

⁷ ECNI (2016) [Gender Equality: Policy Priorities and Recommendations](#), paras 13.6-7, 13.11.

⁸ ECNI (2023) [Response to consultation: The Departments for Justice and Health – Domestic and Sexual Abuse draft Strategy](#) pp. 8-14.

⁹ For example, TEO (2023) [Research Publication: 'It's Just What Happens' Girls and Young Women's Views and Experiences of Violence in Northern Ireland](#)

¹⁰ Commissioner Designate for Victims of Crime (2024) [Male Experiences of Intimate Partner Violence: The ME-IPV Study](#)

¹¹ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), paras 3.92-3.102.

Support vulnerable victims

- 2.12 Aligned to the requirements set out in the Victims Charter¹², we **recommend effective support to meet the needs of vulnerable hate crime victims**; for example, children and young people, and disabled people with particular forms of disability.
- 2.13 The NIPB in its thematic review of race hate crime (2017)¹³ highlighted the importance of tailored support by the PSNI for all victims of hate crime that meets their specific needs.
- 2.14 Measures to support vulnerable victims of hate crime is consistent with the recommendation of the UNCRPD Committee; which in its Concluding Observations on the UK (2017), recommended measures to ensure equal access to justice and to safeguard persons with disabilities, particularly women, children, intersex people and elderly persons with disabilities from abuse, ill-treatment, sexual violence and/or exploitation¹⁴.
- 2.15 In the event that the hate crime legislation is extended to cover additional equality grounds, we **recommend robust support services in place to meet the needs of victims** protected under those equality grounds, particularly vulnerable victims. In particular, we have highlighted the Hate Crime Advocacy Service (HCAS) below.

Improve measurement of victim satisfaction levels

- 2.16 We have **called for the monitoring of satisfaction levels of victims of hate crime** with regards to the effectiveness of the measures in place¹⁵. Capturing the views of victims on levels of satisfaction with services on a regular basis, enables their views to be taken into account, enables trends to be monitored, and identifies areas of improvement.
- 2.17 The NIPB's thematic review of race hate crime highlighted the importance of improving the measurement of the views of

¹² [Victims Charter](#) (2015),

¹³ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#), 'The report recommended that 'in considering the recommendations of HMIC the PSNI should address specifically the vulnerability of victims of hate crime'. See page 88.'

¹⁴ UNCRPD (2017), Concluding Observations on the UK.

¹⁵ ECNI (2017), [Policy Briefing, CJINI report, An inspection of the criminal justice system's response to hate crime in Northern Ireland](#)

victims of hate crime and their satisfaction levels with services¹⁶.

Hate crime advocacy services

- 2.18 The Commission has **recommended¹⁷ action to ensure adequate resources for hate crime advocacy support services**. We understand that funding for the Hate Crime Advocacy Service has been confirmed for 2025/26, with the potential for a year's extension in 2026/27. We understand the future of the service is unclear after that, and it is currently being funded solely by PSNI.
- 2.19 The Commission has previously highlighted¹⁸ that hate crime advocacy support services have the potential to provide valuable specialist support and information to victims of hate crime; including through the work of hate crime advocates across organisations that provide support to individuals from across a range of equality categories.
- 2.20 The CJINI in its report on hate crime (2017), whilst recognising the valuable support provided to victims by the HCAS, recommended that consideration should be given to the source of funding for advocates, and highlighted that there was 'a risk that in the climate of diminishing budgets competing police priorities may result in loss or reduction of the advocacy service'¹⁹.
- 2.21 Judge Marrinan's Review of Hate Crime Legislation found²⁰ that 'the HCAS provides a vital service for victims and their future well-being and also as a means of ameliorating some of the harmful effects of hate crime'. He recommended that HCAS be sustained on a permanent basis with appropriate levels of financial support.
- 2.22 We understand that the planned Sentencing Bill is due to allow for an expansion of protected characteristics under new

¹⁶ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#), p. 29.

¹⁷ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), para 3.92.

¹⁸ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), paras 3.98-3.100.

¹⁹ Criminal Justice Inspection Northern Ireland (2017), [Hate Crime an Inspection of the Criminal Justice System's response to Hate Crime in N.I.](#), at p.39.

²⁰ J Marrinan (2020) [Hate Crime Legislation in Northern Ireland: Independent Review](#), paras 12.60-12.61.

statutory aggravation hate crime provisions²¹. The Commission has previously called for protections to be expanded to cover include age, gender, gender identity, and intersex²². We have also recommended²³ that there is a specific reference to the term 'sectarian' within the hate crime legislation.

- 2.23 NIPB will wish to consider what support will be needed for victims and witnesses of hate crime, if the protected characteristics are expanded.

UNCRPD

- 2.24 The Equality Commission NI and the NI Human Rights Commission are jointly designated as the Independent Mechanism for Northern Ireland (IMNI) to promote, protect and monitor implementation of UNCRPD, and report on this to the UN Committee. The Equality and Human Rights Commission and Scottish Human Rights Commission fulfil this role in Great Britain, and together we form the UK's Independent Mechanism (UKIM).

- 2.25 Article 13 of the UNCRPD requires State parties to ensure that d/Deaf and disabled people have effective access to justice on an equal basis with others. This includes procedural and age-appropriate accommodations to participate in legal proceedings. The Article also requires that provision of training for all relevant personnel involved in the administration of justice.

- 2.26 Research²⁴ undertaken by Disability Action for the Commission raised a number of concerns around d/Deaf and disabled people's access to justice, including:

- barriers with respect to reporting crime and accessing legal advice and representation;
- a lack of knowledge within the legal system of how to book sign language interpreters, and the role of interpreters;

²¹ Department of Justice (09/09/2024) [Written Ministerial Statement: Hate Crime Legislation](#)

²² ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), paras 4.31-4.108.

²³ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), paras 4.189-4.194.

²⁴ Disability Action (2022) [Progress Towards the Implementation of the UNCRPD in Northern Ireland](#), pp. 283-301.

- intermediaries are not widely used, and a significant proportion of vulnerable and intimidated witnesses have been excluded from the use of special measures
- 2.27 NIPB will wish to consider the research²⁵, which includes a detailed chapter on Article 13 of the UNCRPD, when developing the Strategy.
- 2.28 NIPB will also wish to consider the UNCRPD Committee's recommendations²⁶ in its concluding observation on the UK in 2017 that the State Party, in collaboration with Disabled People's Organisations:
- develops and implements capacity-building programmes among the judiciary and law enforcement personnel regarding the rights of d/Deaf and disabled people;
 - ensure that all d/Deaf and disabled people enjoy the right to justice with adequate procedural accommodation; and
 - take measures to ensure d/Deaf and disabled people are empowered to work at all levels within the justice system with the provision of all necessary support
- 2.29 The research also reported²⁷ a lack of specialist services for d/Deaf and disabled people experiencing domestic violence and that many services are inaccessible. For example, d/Deaf and disabled people who have communication challenges may experience barriers in accessing helpline support.

We have Safe and Engaged Communities with Confidence in Policing

- 2.30 In relation to hate crime, we have highlighted below a number of our policy recommendations of relevance to Policing Plan Outcome 2. NIPB will wish to consider the relevance of these to

²⁵ Disability Action (2022) [Progress Towards the Implementation of the UNCRPD in Northern Ireland](#), pp. 283-301.

²⁶ Committee on the Rights of Persons with Disabilities (2017) [Concluding Observations on the Initial Report of the United Kingdom of Great Britain and Northern Ireland](#), UN: CRPD/C/GBR/CO/1, para. 33

²⁷ Disability Action (2022) [Progress Towards the Implementation of the UNCRPD in Northern Ireland](#), commissioned by ECNI, p. 32.

other areas of crime, particularly in relation to impacts on particular equality groups.

2.31 We have **recommended action to address the under-reporting of hate crime by a range of equality groups**, including by:

- raising awareness of hate crime, the methods to report hate crime, the rights of individuals under hate crime legislation, and measures available to support victims, including amongst equality groups and the general public;
- building trust and confidence in the criminal justice system/agencies amongst victims of hate crime, including by working in partnership with equality groups; securing prosecutions and improving outcome rates for hate crimes; ensuring appropriate training for police; ensuring criminal justice agencies are representative of the communities they serve; and improved engagement with victims;
- removing barriers to particular equality groups reporting hate crime by, for example, ensuring reporting mechanisms are accessible; and addressing fears of victims due to lack of anonymity.

2.32 This is particularly important in the context of raising awareness of any changes to the legislation following the hate crime legislation review. If new equality grounds are protected under the hate crime legislation, we recommend measures to raise awareness with individuals and representative organisations of those equality groups so as to raise awareness of hate crime, encourage reporting of hate crime, and to ensure these equality groups have the opportunity to engage, and work with criminal justice agencies on action to tackle hate crime.

2.33 We note that a range of criminal justice agencies, including the CJINI²⁸, the Northern Ireland Policing Board (NI Policing Board)²⁹, and the PSNI have recognised the issue of the under-

²⁸ The Criminal Justice Inspectorate NI reported (2017) that: 'Hate incidents are greatly under-reported so the rate of incidents perpetrated against people because they are perceived to be different in some way is much higher'. See Criminal Justice Inspection Northern Ireland (2017), [Hate Crime an Inspection of the Criminal Justice System's response to Hate Crime in N.I.](#)

²⁹ NIPB (2017), [Thematic Review of Policing Race Hate Crime](#)

reporting of hate crimes experienced by a range of equality groups, including by minority ethnic, LGB and Trans individuals.

2.34 In relation to homophobic hate crime, the 2013 *Grasping the Nettle report*³⁰ identified under-reporting of transphobic hate crime as an issue.

2.35 The UNCERD Committee³¹, in its recent concluding observations, recommended measures to ‘*encourage the reporting of racist hate crimes by strengthening public trust in the police and the justice system, protecting victims from reprisals and intimidation and ensuring that the reporting procedure is transparent and accessible*’.

Raise awareness of hate crime

2.36 Raising awareness of hate crime, the methods to report hate crime, the rights of individuals under the hate crime legislation, as well as measures available to support victims, amongst equality groups, as well as the general public, will encourage reporting.

2.37 Actions, including raising awareness of hate crime, will be particularly important to take in the event that additional grounds, such as gender, gender identity, intersex and age, which we recommend are protected, are protected under the hate crime legislation.

2.38 We note, for example, that an evaluation of the Nottinghamshire police’s policy of recording misogyny hate crime, published in June 2018, found that, while there was high public support for the policy once it was explained, there was little awareness of it and it had not improved the generally low rate of reporting by victims. As highlighted by the UK Parliament’s Women and Equalities Committee in its Inquiry into sexual harassment of women and girls in public places (2018)³², ‘*this suggests the need for policies such as this to be*

³⁰ McBride, ICR (2013), [Grasping the Nettle: The Experiences of Gender Variant Children and Transgender Youth Living in Northern Ireland](#).

³¹ UNCERD (2024) [Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland](#), CERD/C/GBR/CO/21-23, para 20(c)

³² Women and Equalities Committee (2018), [Inquiry into Sexual harassment of women and girls in public places](#) .

backed up by public awareness campaigns and promotion if they are to be effective’.

Build trust and confidence in criminal justice system/agencies

- 2.39 A lack of trust and confidence in the criminal justice system amongst victims of hate crime that their complaints will be taken seriously or dealt with effectively can discourage reporting.
- 2.40 It will be noted that the Advisory Committee to the Framework Convention on National Minorities (2017) raised concerns about the impact of lack of trust in the police and the judicial system on underreporting of hate incidents in Northern Ireland by minority ethnic groups³³.
- 2.41 A targeted and collaborative approach by relevant public bodies working in partnership with equality groups, representative organisations and others, assists in understanding the particular barriers to reporting hate crime and with working in partnership to develop solutions. We welcome initiatives, including by the PSNI, already taken to address the under-reporting of hate crime by working in partnership with certain equality groups.
- 2.42 Taking measures to secure prosecutions and improve outcome rates for hate crimes will also encourage reporting of hate crime. This was recognised by the NI Policing Board (2017) which stated that ‘one thing that will undoubtedly encourage victims to report is where it is seen that perpetrators are being brought to justice’.
- 2.43 Ensuring appropriate training for police officers will also assist with encouraging reporting. A 2015 NI Policing Board review relating to transgender individuals³⁴ noted that a number of steps had been taken by the police to encourage the reporting of hate crime, including training of police officers and the ability to report incidents online. The review³⁵ further noted that the *‘...PSNI must ensure that in practice all personnel are aware of*

³³ Advisory Committee to the Framework Convention on National Minorities (2017) , Fourth Opinion on the United Kingdom’, at para 80.

³⁴ NIPB (2015) [Human Rights Thematic Review – Policing with and for Trans Individuals. Update on PSNI implementation of recommendations](#)

³⁵ NIPB (2015) [Human Rights Thematic Review – Policing with and for Trans Individuals. Update on PSNI implementation of recommendations](#)

their roles and that they are discharging their responsibilities effectively’.

2.44 Further, as noted by the NI Policing Board (2017)³⁶:

“While hate crime currently comprises only a small proportion of the cases dealt with by a police officer (recognising however significant under-reporting), unless equipped to recognise those cases and respond appropriately, it is likely that when such cases do arise, the aggravating feature will not be recognised. If hate crimes are not recognised or not properly addressed by the criminal justice system, both the victim and the wider community may lose confidence in the justice process”.

2.45 In addition, measures by the PSNI and other criminal justice agencies to continue to strive for a truly diverse workforce that is representative of the communities they serve, will also help build trust and confidence with communities.

2.46 Improved engagement with victims will also help build trust and confidence of victims with criminal justice agencies which in turn can assist with under-reporting of hate crime; ensure that victims are better informed of the progress of their case; and help improve levels of victim satisfaction with services provided. The NIPB highlighted the importance of the PSNI improving engagement with victims of hate crime³⁷.

2.47 The UNCERD Committee recently recommended³⁸ measures to *‘investigate all reported racist hate crimes, prosecute the perpetrators and punish them with sanctions commensurate with the gravity of the offence, and provide effective remedies to the victims and their families’.*

³⁶ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#)

³⁷ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#).

In particular, it recommended additional actions by police officers to ensure that hate crime victims were regularly informed of progress on their cases and to explore with partners how to better engage with victims and potential victims of hate crime so that they are better informed of the services they are entitled to receive from the police and other agencies.

³⁸ UNCERD (2024) [Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland](#), CERD/C/GBR/CO/21-23, para 20(d).

Remove barriers to reporting hate crime

- 2.48 Removing barriers to particular equality groups reporting hate crime will also increase reporting. We highlighted in our *Racial Equality Priorities and Recommendations* (2014) that there was a need to improve the accessibility of reporting for those victims who have English as an additional language³⁹.
- 2.49 In its 2017 report, the CJINI highlighted that: ‘No specific work had been undertaken with interpreter services to enhance skills specific to translating for hate crime, which added to the already high number of substantial barriers facing victims’⁴⁰.
- 2.50 It is important to ensure that fears due to lack of anonymity during and after court proceedings do not act as a barrier to LGBT people or other equality groups seeking, and being provided with, protection against hate crime.

PSNI have a Representative, Valued and Enabled Workforce

- 2.51 NIPB will wish to consider how this Outcome will interact with specific workstreams within PSNI, including the draft Race and Ethnicity Action Plan⁴¹.
- 2.52 The **Commission is available to provide more detailed advice on lawful positive action measures** in relation to this section of the Plan.
- 2.53 We recommend **guidance and training for criminal justice agencies**, including the PSNI, which should include training on **equality rights, awareness of the particular needs of equality groups, and on tackling prejudicial attitudes**.
- 2.54 This training and guidance should include awareness of the rights of equality groups, as well as the need to address the particular needs of equality groups, including older people, LGB+ and trans people, minority ethnic people, and disabled people. It should also include tackling negative stereotypes and prejudice towards certain equality groups, as well as promoting

³⁹ ECNI (2014), [Racial Equality Priorities and Recommendations](#)

⁴⁰ The CJINI made clear that: ‘Interpreter services were readily available and there was no suggestion that the standard of interpreters was an issue. However, investigation of hate crime required precise legal and technical language. See Criminal Justice Inspection Northern Ireland (2017), [Hate Crime an Inspection of the Criminal Justice System's response to Hate Crime in N.I.](#), page 8.

⁴¹ PSNI (2024) [Race and Ethnicity Action Plan 2025 - 2027 Consultation](#)

positive attitudes towards these groups. This will increase awareness and understanding of these issues and the barriers equality groups' experience.

- 2.55 We draw attention to the UNCRPD's Committee Concluding Observations on the UK (2017) which recommended that the UK Government: 'Develop and implement capacity building programmes among the judiciary and law enforcement personnel, including judges, prosecutors, police officers and prison staff, about the rights of persons with disabilities'.
- 2.56 We endorse the recommendation of the NI Policing Board in its *Thematic Review of Policing Race Hate Crime* (2018) that called for training on equality and human rights for police officers⁴². This training should include training relating to all equality grounds that may be covered in a revised hate crime framework.
- 2.57 Increasing guidance and training for the PSNI, including on equality issues, will improve awareness and understanding of the particular needs of, and the impact of hate crime on, different equality groups, and will better ensure an effective response to hate crime.
- 2.58 It will be noted that the NI Policing Board (2017)⁴³ made clear that: "While hate crime currently comprises only a small proportion of the cases dealt with by a police officer (recognising however significant under-reporting), unless equipped to recognise those cases and respond appropriately, it is likely that when such cases do arise, the aggravating feature will not be recognised. If hate crimes are not recognised or not properly addressed by the criminal justice system, both the victim and the wider community may lose confidence in the justice process".
- 2.59 We note that the UK Government in its hate crime action plan (2018) has committed to improving training for police and the wider criminal justice system to recognise and respond to hate crime.

⁴² Northern Ireland Policing Board (2017) , [Thematic Review of Policing Race Hate Crime](#)

⁴³ Northern Ireland Policing Board (2017) , [Thematic Review of Policing Race Hate Crime](#)

3 Monitoring

- 3.1 We recommend that any approach to progressing the key outcomes should consider the particular needs of the range of equality groups, including needs at specific points in the victim journey.
- 3.2 **We recommend that the Plan ensures the meaningful involvement of individuals and their representative organisations in the design, delivery and review of policies and programmes** affecting them. It is important that the expertise and advice used reflects the needs of different equality groups.
- 3.3 We recommend a focus on data collection, when progressing the outcomes, Annual reports on performance will rely on disaggregated data to accurately reflect how the Strategy is affecting different groups. In turn, this will assist in effectively targeting actions to meet objective needs, and to mitigate against any negative impacts.
- 3.4 Our general recommendation is that **all key measures should not only be tracked in aggregate, but also for the impact on individuals from each of the equality grounds**. Providing comprehensive equality metrics for all key measures will assist equality considerations to be a core component of public policy design and delivery, facilitating the fuller targeting and delivery of interventions, including for the full range of equality groups.
- 3.5 In relation to both ongoing monitoring and any mid-term review, we recommend that the **data used for headline measures be broken down to consider which equality groups are benefitting less than others on those key measures**. Actions can then be targeted to those particular groups and their related barriers and enablers. This will benefit not only the members of those equality groups, but also the relevant overall headline measures and the overall success of the Strategy itself.
- 3.6 **We recommend that the Plan, and associated budget, includes provision to ensure the targeting, monitoring and reporting of actions**, incorporating disaggregated equality data, to better advance equality of opportunity and address key inequalities.

- 3.7 There is a **lack of detail as to how the Plan will be monitored**, including for its impact on particular equality groups.
- 3.8 For instance, in relation to ethnic equality monitoring, the Racial Equality Strategy 2005-2010 sets out at paragraph 4.21 (p.42) that:
- ‘Ethnic monitoring (the process used to collect, store, and analyse data about people’s ethnic backgrounds) by service providers of key aspects of their services is essential to achieve racial equality. To have a racial equality policy without ethnic monitoring has been likened to aiming for good financial management without keeping financial records.*
- A proper system of ethnic monitoring will allow service providers to:*
- *highlight possible inequalities;*
 - *investigate their underlying causes; and*
 - *remove any unfairness or disadvantage.’*
- 3.9 Such equality monitoring could encompass recruitment, training, progression, retention, grievances, complaints, disciplinary procedures, stop and search, charging and use of force (non-compliant use of handcuffs, use of batons, spit guards and Tasers). This is not an exhaustive list.
- 3.10 NIPB will wish to consider how to assess **satisfaction of officers, members of the public and victims of crime**, including hate crime, from across the equality groups. This could provide a useful barometer to identify problems at an early stage and enable early intervention.
- 3.11 We recommend the collection and sharing of comprehensive equality data to support the targeting of interventions to advance equality, and the tracking of impacts on individuals from across the full range of equality grounds.
- 3.12 We recognise that there are some limitations to meaningful data disaggregation, however where robust to do so, disaggregation by equality category and multiple identity would provide greater information to inform the better targeting of policy interventions.

- 3.13 Analysing and publishing comprehensive equality metrics for all key measures will further assist equality considerations to be a core component of public policy design and delivery.
- 3.14 Datasets should contain comprehensive equality data to facilitate full equality analysis. There is a need to address any gaps in the equality data held within key datasets.

4 Conclusion

- 4.1 In general, we would welcome any potential contribution that the Policing Plan can make to furthering equality and avoiding the emergence or widening of inequality.
- 4.2 The Commission has developed detailed recommendations in relation to hate crime, available at www.equalityni.org/HateCrimePolicy
- 4.3 We request that the NIPB should give full consideration to our recommendations in developing the Plan. If further discussion would be useful, please do not hesitate to contact us at publicpolicy@equalityni.org

**Equality Commission for Northern Ireland
December 2024**