



EQUALITY COMMISSION FOR NORTHERN IRELAND

Response to Consultation:

PSNI: Race and Ethnicity Action Plan 2025-2027

December 2024

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Executive Summary

- i. The Commission welcomes the opportunity to respond to the Police Service of Northern Ireland's consultation on the Race and Ethnicity Action Plan 2025 – 2027.
- 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.
- iv. The draft Plan is high-level, and we have highlighted that further information would be helpful, including in relation to monitoring.
- v. We have also highlighted a range of other public policy recommendations in response to the consultation, including:
 - the effective involvement of ethnic minority communities and representative organisations in the development, delivery, monitoring and review of the action plan;
 - the use of ethnic equality monitoring;
 - further consideration of the needs of those with particular multiple identities; and
 - guidance and training on anti-racism, equality rights, awareness of the particular needs of equality groups, and on tackling prejudicial attitudes.

1 Introduction

- 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 Police Service of Northern Ireland's (PSNI) consultation on the draft Race and Ethnicity Action Plan (REAP). 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 We note that the **Action Plan is currently quite high-level, which makes it more difficult to comment** on its likely effectiveness.
- 1.4 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.

Cross-cutting Policy Recommendations

- 1.5 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, including:
 - **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.

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

- **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. Ethnic equality monitoring is discussed in further detail below.
- **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 public policy and service delivery.
- **Implementation Friendly Design:** When drafting policy and legislation, it is important to consider and 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

- 1.6 This response primarily relates to the Commission’s public policy recommendations.
- 1.7 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.

- 1.8 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 Draft Action Plan

General comments

- 2.1 In previous engagement with TEO Racial Equality Sub-group, reference was made to the Racial *Equality* Action Plan (emphasis added). We recommend that the **title of the draft plan should refer to equality**, to make clear the purpose of the plan, the importance of furthering equality of opportunity, and conscious of arguments that there is only one human race, but nonetheless groups of humans are racialised².
- 2.2 We note there is some reference to young people, and mental ill-health, but the draft Plan does not refer to intersectionality/ multiple identities. It also does not refer to other relevant work, such as the PSNI's Violence Against Women and Girls Action Plan. We recommend that the **PSNI consider the needs/ barriers of those with multiple identities**.
- 2.3 The Plan should **reference relevant guidance from international human rights treaty bodies, and reflect best international standards**. In particular, the recent UN **Committee on the Elimination of Racial Discrimination (CERD) recently made concluding observations to the UK Government³**, as referred to throughout this submission. The PSNI will wish to consider CERD's Concluding Observations in full.

² Daniels, S. (2022): The Anti-Racist Organisation - Dismantling Systemic Racism in the Workplace, pp. 27-26 (Wiley)

³ 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.

2.4 Wider guidance which may be useful to consider includes:

- European Commission Against Racism and Intolerance (2023) [Preventing and combating racism and intolerance within law enforcement agencies: Factsheet](#)
- UN Committee on the Elimination of Racial Discrimination (2020) [General recommendation 36 on preventing and combating racial profiling by law enforcement officials](#)
- Council of Europe (2014) [The European Convention on Human Rights and policing](#)
- European Commission Against Racism and Intolerance (2007) [General Policy Recommendation No.11 on combating racism and racial discrimination in policing](#)
- UN Committee on the Elimination of Racial Discrimination (2005) [General recommendation 31 on the prevention of racial discrimination in the administration and functioning of the criminal justice system](#)
- OHCHR (1997) [International Human Rights Standards for Law Enforcement](#)

Commitments of REAP

2.5 We note the five commitments of the REAP, and the statement that *'We want the Police Service of Northern Ireland to be an actively anti-racist organisation where we actively demonstrate upstander behaviours against racism and prejudice'*.

2.6 However, it is not clear whether the five commitments are an aspiration or a reflection of where the PSNI considers it is currently. For example, the commitment that 'We are an anti-racist Police Service' differs from the above statement that 'We want the PSNI to be an actively anti-racist organisation'.

2.7 The PSNI will wish to ensure that these commitments are meaningful, with clear actions. For instance, as noted above, the Commission recommends that officers and staff receive initial and in-service anti-racism and cultural diversity training.

People Principles/ Public Engagement Pillars

- 2.8 There seems to be considerable overlap between the 'People Principles' and the 'Public Engagement Principles'.
- 2.9 The final Action Plan should clarify how these sections relate, and how they will be monitored and reviewed.

3 Action Plan Framework: Workstreams

- 3.1 In general, the workstreams lack clear, time-bound targets. It is not clear how outcomes will be measured, and what will count as success. There are high-level commitments, but a lack of information on how and when these will be accomplished, and how they will be maintained.
- 3.2 This lack of detail makes it more difficult to comment on the workstreams.
- 3.3 The PSNI may wish to consider approaches taken by other police services. For instance, the Metropolitan Police's London Race Action Plan⁴ outlines Measures of Performance and Measures of Success.
- 3.4 It is not clear what the status of the sub-headings for each workstream are e.g. 'A Police Service that is representative of ethnic minorities and supports its ethnic minority officers and staff'. It would be helpful to clarify this.

Internal Culture and Inclusivity

- 3.5 We note the intention for '*A Police Service that is representative of ethnic minorities and supports its ethnic minority officers and staff*'.
- 3.6 However, there is a lack of detail as to how outcomes and actions will be achieved, monitored and evaluated. For instance, in relation to '*Equip frontline supervisors to create an environment of support and ally ship within and external to PSNI*', it would be helpful to clarify what is meant by external allyship, and further detail on what actions will be taken.

⁴ Metropolitan Police (2024) [London Race Action Plan](#), Appendix A-B

- 3.7 Meaningful involvement of ethnic minority staff will be particularly important to this workstream and the wider Action Plan, not just to share views, but in relation to the development, delivery and monitoring of policies and practices. There is a lack of detail as to how the Ethnic Minority Policing Association (EMPA) will be involved in this work.⁵ We note that the London Race Action Plan includes a commitment to engage with ethnic minority officers through existing staff support organisations and networks.
- 3.8 We recommend guidance and training for criminal justice agencies, including the PSNI **on anti-racism, equality rights, awareness of the particular needs of equality groups, and on tackling prejudicial attitudes**. We note that the Plan refers to cultural competence and awareness. Although increased cultural understanding is welcome, cultural awareness training is not a substitute for anti-racist training. Anti-racist training should also be undertaken by administrative and ancillary staff.
- 3.9 We note that the NPCC and College of Policing's Police Race Action Plan: Improving Policing for Black People includes a number of explicit references to anti racism training, for example developing a co-designed product, and training for mentors, coaches, and misconduct and complaints panels⁶
- 3.10 It would be helpful to clarify how any appraisal process will be used to ensure an anti-racist policing culture.
- 3.11 We note that the CERD concluding observations⁷ included a recommendation to '*Take effective steps to increase the representation of ethnic minorities in the police and military institutions, including at senior decision-making positions*'.
- 3.12 We note the under-representation of ethnic minority communities within the PSNI, in relation to both police officers and support staff. We also note that the London Race Action Plan⁸ references the use of Positive Action workshops for Black officers which have seen pass rates for promotion increase

⁵ Metropolitan Police (2024) [London Race Action Plan](#), p.18

⁶ NPCC and College of Policing's (2022) [Police Race Action Plan – Improving Policing for Black People](#), pp 22, 24, 26.

⁷ 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 32 (d).

⁸ Metropolitan Police (2024) [London Race Action Plan](#), pp. 10, 14.

from 68% to 75%, and bespoke career development support for under-represented groups, as part of a commitment to work to address disparities in promotion rates and to address underrepresentation across ranks.

- 3.13 The **Commission is available to provide more detailed advice on lawful positive action measures** in relation to this section of the Plan.

Professionalism, Powers and Policy

- 3.14 We note the intention for '*A Police Service that is fair, respectful and proportionate in its actions towards people from ethnic minority backgrounds*'.
- 3.15 An independent research report we commissioned into the impact of Brexit on minority ethnic and migrant people (2023) found that Northern Ireland has very high levels of Stop and Search which are carried out disproportionately on minority ethnic people.⁹
- 3.16 The PSNI should ensure that individuals are not subject to stop and search, or other police powers, solely because of their equality characteristics (for example through racial profiling), with appropriate actions implemented to address any issues identified.
- 3.17 As outlined in further detail below, we highlight the importance of ethnic equality monitoring, which is crucial to understanding how police powers are used. We have called for the robust collection, analysis and regular publication of stop and search data on minority ethnic groups to ensure racial profiling does not occur during Stop and Search.
- 3.18 We have also called for the PSNI to consider any impact of Brexit on levels of Stop and Search on minority ethnic people and take effective action to address any identified impact.¹⁰
- 3.19 Further, we recommend PSNI ensure that there is effective training and guidance, including for officers carrying out stop

⁹ Pivotal (2023) [Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#). (ECNI).

¹⁰ ECNI, [Policy Recommendations: Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#). (August 2024)., p. 52.

and search, on anti-racism and cultural diversity so as to prevent any racial profiling in Stop and Search.

- 3.20 The Commission also notes that analysis of PSNI stop and search figures by Amnesty International (2023) show that Irish Travellers were the ethnic group most disproportionately searched, accounting for 355 stops - 2.7% of the overall figure - despite making up just 0.1% of the Northern Ireland population.¹¹
- 3.21 We note that the relevant NPCC and College of Policing Action Plan explicitly acknowledges that disparities also exist in policing's relationships with Gypsy, Roma and Traveller communities and commits to ongoing efforts to ensure that policing is inclusive and fair to all, and that concerns from minority or under-represented groups are acted on¹².
- 3.22 Considerations of intersectional issues across the equality groups should be undertaken throughout this Workstream and the wider Strategy.
- 3.23 There is some reference to intersectional issues within this Workstream e.g. in relation to young people and mental ill-health. However, further information would be helpful. For example, there is a lack of detail on training for '*Dealing with Ethnic Minority children in an age appropriate and culturally sensitive way*'. The PSNI will also wish to consider engaging with relevant bodies on this issue, such as NICCY.
- 3.24 Further, we note that 84% of those stopped and searched/questioned in the last year were male¹³, and therefore, such powers are likely to have a particular impact on men from ethnic minority communities.
- 3.25 Likewise, when considering '*cultural identity, heritage, vulnerabilities, experiences and circumstances*', it may be appropriate to consider the needs particular groups within ethnic minority communities, such as women, and LGBT+

¹¹ Amnesty International (24 May 2023) [Northern Ireland: PSNI stop and search figures show continued racial disparity](#)

¹² NPCC and College of Policing's (2022) [Police Race Action Plan – Improving Policing for Black People](#), p. 7.

¹³ PSNI (2024) [Use of Stop and Search Powers by the Police in Northern Ireland](#)

people, in relation to issues like domestic and sexual abuse, or so-called ‘honour’ crimes.

Community Engagement and Relations

- 3.26 We note the intention for ‘*A Police Service that routinely involves, engages and delivers for people from ethnic minority communities no matter the manner*’.
- 3.27 This includes a proposal to engage with ethnic minorities in developing police policies and practices and routinely have representation in police oversight and scrutiny processes.
- 3.28 We have attended the PSNI’s Reference, Engagement and Listening events, and note the steps that have been taken to engage with ethnic minority communities, including following the violence of Summer 2024.
- 3.29 However, the Action Plan does not refer to any **structural arrangements at regional level for liaison** with minority ethnic communities and representative organisation/s i.e. an Advisory Panel which could help to ensure a coherent and consistent approach to racial equality in policing across the region.
- 3.30 It is not evident that the REaL events will be a substitute for a Regional Racial Equality Advisory Group (with representation from the sector) which can advise on, monitor and evaluate the implementation of the Plan at a strategic level. However, the findings from the REaL events can usefully inform discussion at a Regional Racial Equality Advisory Group.
- 3.31 We note that the National Police Chiefs Council (NPCC) and College of Policing’s ‘Police Race Action Plan: Improving Policing for Black People’¹⁴ commits to the routine involvement of Black people and communities in the governance of policing.
- 3.32 That Plan is monitored by an Independent Scrutiny and Oversight Board. The ISOB has an experienced All Black Board, chaired by a Human Rights barrister, which holds regular townhall meetings with its Accountability Forum. The ISOB produces an Annual Report and Executive summary.

¹⁴ NPCC and College of Policing (2022) Police [Race Action Plan – Improving Policing for Black People](#)

- 3.33 We also note that that the London Race Action Plan refers¹⁵ to an externally chaired Community Reference Group to challenge, influence and guide, and to a commitment to develop a simplified and more effective scrutiny model with accurate representation from communities to test and challenge policies.
- 3.34 We recommend measures to **build capacity and ensure adequate resources for organisations that represent ethnic minority communities.**
- 3.35 It is welcome that the draft PSNI Plan includes actions related to hate crime. The **Commission has made a range of recommendations¹⁶ in relation to hate crime**, including in relation to improving criminal justice responses to hate crime and actions to address under-reporting and to support victims.
- 3.36 The Commission has recommended a **holistic, co-ordinated, and collaborative approach to tackling hate crime**, with clear leadership by public bodies, public representatives and others, ensuring effective engagement with equality groups¹⁷. This should include the development and sharing of good practice initiatives to tackle hate crime across different sectors, including by the DoJ, local councils and criminal justice agencies.
- 3.37 Involving stakeholders from across the range of equality categories in delivery will further inform and enable targeted local responses to specific barriers, including those experienced by victims of hate crime.
- 3.38 Adopting this collaborative approach is consistent with the recommendations of international human rights monitoring bodies. For example, the UNCERD Committee (2016) recommendations on the UK include to ensure that measures to combat racist hate crimes are developed with the meaningful participation of affected groups¹⁸.
- 3.39 The draft Plan doesn't refer to identifying and addressing barriers to ethnic minority communities reporting crime,

¹⁵ Metropolitan Police (2024) [London Race Action Plan](#), pp. 11, 18.

¹⁶ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales](#)

¹⁷ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales](#), pp. 37-43.

¹⁸ UNCERD Committee (2016) [Concluding Observations on the UK](#).

including hate crime. We recommend that the PSNI works to **remove barriers to reporting crime**, including hate crime, by, for example, ensuring information and reporting mechanisms are accessible and culturally appropriate.

- 3.40 In August 2024 the Commission produced policy recommendations¹⁹ relating to the impact of Brexit on minority ethnic and migrant people in Northern Ireland, based on independent research²⁰.
- 3.41 It will be of interest to the PSNI that many participants at Commission engagement events on the research pointed to deterrents to reporting hate crime, including the perception that police will share the victim's immigration status with immigration authorities, and the feeling that racist hate crime is not a police priority; either as regards the time taken to respond or the response itself. Members of the Roma community in particular reported fear of going to the police.
- 3.42 We note it is proposed that there will be a regular audit of PSNI response to victims of hate crime. It is unclear whether this audit will be shared publicly, or key findings shared with stakeholders and affected groups to help monitoring and review of the Strategy.
- 3.43 We note that the **audit areas do not seem to include measuring victim's satisfaction levels**. We have called for the **monitoring of satisfaction levels of victims of hate crime** with regards to the effectiveness of the measures in place. 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 for improvement.
- 3.44 The NI Policing Board in 2017 in its thematic review of race hate crime recommended improved measurement of the views of victims of hate crime and their satisfaction levels with services²¹.

¹⁹ ECNI, [Policy Recommendations: Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#). (August 2024).

²⁰ Pivotal, [Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#). (ECNI, 2023).

²¹ Northern Ireland Policing Board (2017) [Thematic Review of Policing Race Hate Crime](#), pp. 28-29.

- 3.45 We note that the London Race Action Plan²² refers to raising to ‘awareness of how to make a complaint and to seek to better understand how complaints by Black people are handled and identify and act on areas of disproportionality’.

Protection, Partnership and Justice

- 3.46 We note the intention for ‘*A Police Service that protects people from ethnic minority backgrounds from crime and seeks justice for all*’.
- 3.47 Although this workstream refers to partnership, there is a lack of reference to partnering with ethnic minority community organisations, and other bodies who may be able to assist in this work e.g. the NI Human Rights Commission, NICCY, the Victims of Crime Commissioner-Designate etc.
- 3.48 Similar to the other workstreams, there is a lack of detail. For example, it is not clear how the PSNI propose to improve response and effectiveness in relating to supporting vulnerable people from ethnic minority communities, or in supporting missing persons.
- 3.49 We note the reference to preventing ethnic minorities from becoming victims, especially of hate related crime. The Commission has **recommended²³ action to prevent hate crime, including by tackling prejudicial attitudes and negative stereotypes against equality groups**. The PSNI will wish to consider how it can help tackle prejudicial attitudes and negative stereotypes, so as to ensure that workplaces, services, public spaces and communities are free from harassment and/or discrimination across the equality grounds.
- 3.50 We note the reference to promoting the use of hate crime advocates. We have previously recommended²⁴ that there are **adequate resources for such services**.
- 3.51 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

²² Metropolitan Police (2024) [London Race Action Plan](#), p. 17.

²³ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales](#), pp. 3-6.

²⁴ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales](#), pp. 23-25.

service is unclear after that, and it is currently being funded solely by PSNI.

3.52 The Commission has previously highlighted²⁵ 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.

3.53 Judge Marrinan’s Review of Hate Crime Legislation found²⁶ 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.

3.54 The recent UN CERD concluding observations to the UK Government²⁷, made a number of recommendations relating to hate crime, including, but not limited to:

- Adopt a comprehensive legal framework to combat racist hate crimes, take effective measures to ensure its implementation and provide continuous training to law enforcement officials, judges and prosecutors on addressing and investigating hate crimes;
- 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; and
- 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

²⁵ ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationales Full Report](#), paras 3.98-3.100.

²⁶ J Marrinan (2020) [Hate Crime Legislation in Northern Ireland: Independent Review](#), paras 12.60-12.61.

²⁷ 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

Performance and Accountability

- 3.55 We note the intention for ‘*A Police Service that measures performance, uses evidence based decision making and delivers positive outcomes for our communities and workforce*’.
- 3.56 Nevertheless, Workstream 5 is very high-level, with an absence of detail on how the PSNI will measure performance, use evidence-based decision making and delivers positive outcomes for communities and workforce, as proposed.
- 3.57 As above, in relation to Workstream 3, the Action Plan does not refer to any **structural arrangements at regional level for liaison** with minority ethnic communities and representative organisation/s, including the EMPA, which can advise on, monitor and evaluate the implementation of the Plan at a strategic level.
- 3.58 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.
- 3.59 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.
- 3.60 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.

Ethnic equality monitoring

- 3.61 We recommend that the **Plan commit to ethnic equality monitoring**. The introduction of ethnic equality monitoring is

one of three priority actions for the TEO Racial Equality Strategy 2015-2025. 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.’*

3.62 We recommend that ethnic equality monitoring 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.

3.63 We note for example that the NPCC and College of Policing Race Action Plan²⁸ highlights the need for a data gap analysis and recommendations for gaps to be addressed and for data collection to include Data and information to measure impacts and outcomes, and to allow external scrutiny of the programme.

3.64 We further note that the London Race Action Plan²⁹ includes commitments to gather and report on metrics concerning:

- Levels of representation within the Met including the numbers of Black police and staff at all ranks and bandings;
- Representation in promotion processes;
- The levels of victimisation and disproportionality;
- Use of force;

²⁸ NPCC and College of Policing’s (2022) [Police Race Action Plan: Improving Policing for Black People](#), p. 60.

²⁹ Metropolitan Police (2024) [London Race Action Plan](#)

- Level of trust that Black people have in police;
- Ethnicity of officers and staff entering the misconduct processes;
- Disproportionality in complaints data;
- Bullying and harassment levels and upstanding behaviour;
- Analysing rates of repeat victimisation for victims of hate crime;
- Victim satisfaction rates.

3.65 The Plan³⁰ includes a commitment to closing the ethnicity gap in levels of trust measured by the public attitude survey.

3.66 We note that the CERD concluding observations³¹ included a recommendation to *‘Create or strengthen effective mechanisms to regularly collect and qualitatively assess information on perpetrators and the victims, for all incidents, complaints and investigations of racial profiling, stop and search, strip searches and excessive use of force by law enforcement and other public officials’*.

3.67 The PSNI’s Plan should also set out **arrangements for assessing the satisfaction of officers from ethnic minority communities, members of the public** (for example via periodic surveys) and **victims of crime**, including hate crime. This could provide a useful barometer to identify problems at an early stage and enable early intervention.

3.68 There is a need to collect and share 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.

3.69 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.

³⁰ Metropolitan Police (2024) [London Race Action Plan](#), p. 21.

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 32 (f).

- 3.70 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.
- 3.71 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 Additional information

- 4.1 It may be helpful to consider the Commission's December 2023 response to NIO's consultation on the TACT code of practice³².
- 4.2 The PSNI may also find it useful to consider research commissioned by ECNI on the Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland³³.
- 4.3 The Commission has developed detailed recommendations in relation to hate crime, available at www.equalityni.org/HateCrimePolicy
- 4.4 For further information on the Commission's work in relation to racial equality, see www.equalityni.org/Race
- 4.5 For the Commission's full position and recommendations regarding Equality Data, please see: www.equalityni.org/EqualityData
- 4.6 In general, we would welcome any potential contribution that the Race and Ethnicity Action Plan can make to furthering equality and avoiding the emergence or widening of inequality.
- 4.7 We request that the PSNI give full consideration to our policy recommendations in developing the Strategy.
- 4.8 If further discussion would be useful, please do not hesitate to contact us at publicpolicy@equalityni.org

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³² ECNI (2023) [Response: NI Office consultation on update of Code of Practice \(NI\) for the Authorisation and Exercise of Stop and Search Powers](#).

³³ Pivotal (2023) [Impact of Brexit on Minority Ethnic and Migrant People in Northern Ireland](#), commissioned by ECNI.