

Response ID ANON-8Z18-SS1P-2

Submitted to **Draft Strategic Police Priorities for Scotland**

Submitted on **2016-08-16 15:53:04**

Introduction

Are you responding as an individual or an organisation?

Organisation

What is your name or your organisation's name?

Name/orgname:

The Coalition for Racial Equality and Rights

What is your email address?

Email:

rebecca@crer.org.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Page One

1 Do the revised Strategic Police Priorities sum up your ambitions for your police service?

Not Answered

Comments::

Overall, the revised Strategic Police Priorities provide a good framework for achieving our ambitions for the police service. However, CRER would like to make a few comments about the priorities as they stand.

A. Localism – This priority states that the police service should aim to understand the needs of local communities and reflect these in planning and delivery. CRER is not convinced that “Localism” is the correct word to summarise this ambition. Indeed, a geographical approach can fail to meet the needs of groups who share a protected characteristics. Whilst this consultation recognises that communities do not always have a traditional geographic basis, CRER has concerns regarding the use of “Localism” as a priority.

The 2012 report ‘Hard-to-Reach or Easy-to-Ignore: A rapid review of place-based policies and equality’ by Dr. Peter Matthews, Dr. Gina Netto, and Kirsten Besemer found that:

- In place-based policies, socio-economic inequality is much easier for policy makers to focus on than exclusion and deprivation faced by equalities groups;
- The different spatial distribution of equalities groups in Scotland suggest any future place-based policies should have equalities as a key focus; and,
- Place-based policies have routinely failed to meet the needs of equalities groups.

As such, CRER believes it is important for the police services to consider the need to understand the needs of all communities, not just communities of place, which perhaps renders the term “Localism” insufficient.

We also note that the background information for this priority states that, “...police services need to be responsive to the needs of all these diverse communities.” This seems to be an add-on rather than a genuine commitment to the needs of equalities groups, particularly considering the focus on local issues prior to this. CRER asks that this priority be re-considered in light of the differing needs of groups who share a protected characteristics.

Furthermore, CRER believes there to be very little minority ethnic representation on Local Authority Police Scrutiny Committees, Community Planning Partnerships, or Community Councils. This will create a barrier for these communities to engage with local commanders and police services to shape the delivery of local services.

We also note our position that the term ‘communities of interest’ should be used instead of ‘diverse communities,’ as the term ‘diverse’ is sometimes thought to only apply to BME groups and leaves out other equalities groups.

Finally, for minority ethnic communities, an important aspect of ensuring that the needs of communities are understood is ensuring that the police services are reflective of Scotland’s communities. With only 1% of police officers, police staff, and special constables having a minority ethnic background, increased representation should be a key aspect of this priority. This is perhaps the most significant barrier for minority ethnic communities in engaging with police services

locally and nationally.

b. Prevention – CRER believes this is an important priority to highlight. For minority ethnic communities, a crucial aspect of this is properly and effectively addressing 'low level' racist incidents before they escalate, particularly before they escalate into acts of racist violence.

To reduce hate crime, preventative approaches must include an emphasis on tackling this 'low level' offending. In our experience, many people who report ongoing racist harassment (often culminating in violence or serious damage to property) have previously complained to the police services about issues such as verbal harassment or minor vandalism. These complaints are often not resolved at an early stage; doing so could potentially discourage further incidents.

In one such case, the person being harassed had complained repeatedly and no action had yet been taken against the perpetrators. When they eventually attacked him on his doorstep, he fought back. The Police arrested him instead of the perpetrators, and held him for some time. He eventually received an apology, however this does not change the lack of support and unfair treatment he experienced throughout his engagement with the police services.

Indeed, individuals should be encouraged to report these 'low level' incidents and the police services should respond appropriately. If not, minority ethnic individuals will feel as though it is useless to report racist incidents and will hesitate to report more significant offences. It is crucial that the response to 'low level' crimes is thorough and does not result in victims feeling unheard or let down by police services.

As part of the prevention agenda, the police services must consider offering diversion activities which ask people to look at attitudes and beliefs which fuel these racist acts. These activities should encourage attitude change, which is especially pertinent considering that most racist crimes in Scotland are committed by young white men. Diversion is not enough. Simply getting individuals to participate in an activity, such as a game of football, doesn't actually change or challenge attitudes. Robust evaluations are needed from the beginning of these activities and programmes to ensure that the police services know what is effective and what is not in anti-racist work. CRER notes that this is part of a wider programme of work that will involve other public bodies and services, particularly schools, but would encourage police services to lead the way in this endeavour.

C. Response – CRER agrees that responding to incidents effectively and efficiently should be a priority for the police services. For minority ethnic communities, a poor response to a racist incident or hate crime fuels a distrust of the police services and causes communities and individuals to feel unsafe.

CRER has much anecdotal evidence of dissatisfaction with how Police respond to and investigate incidents. We are aware of several cases where people have been discouraged from reporting a crime as being racially motivated; usually this occurs in face-to-face contact with officers. Typically this involves the officer(s) putting forward alternative motivations or asserting their own opinions in a way that diminishes the complaint being made, for example one person who received a threatening, racist email was repeatedly asked if it could be 'just a prank' and whether it was 'worth the hassle' to pursue the complaint.

Cases where investigations have been pursued ineffectively have also been noted by CRER, for example not enough evidence being included regarding racist motivations, resulting in racial aggravation charges being dropped. Appropriate effort must be put into investigation of potential racial aggravation.

There also seems to be a weak point in the criminal justice process between Police Scotland's investigatory role and the Procurator Fiscal's role in prosecuting; in one such case, a person who was permanently injured during a serious racist assault which was captured on CCTV co-operated extensively with the Police and was confident that the perpetrators would be brought to justice, however after passing the case on to the Procurator Fiscal, all contact with him ceased without explanation and as far as he is aware, the case never came to court. It is critical that this process be better explained to victims and that support and information is offered throughout this process. Police services should work closer with the Procurator Fiscal to ensure this process is made clear to victims, who are often left feeling frustrated and disappointed.

D. Collaborative Working – CRER is supportive of this priority and believes that improved response to racist incidents and improved relationships with minority ethnic communities can build trust in the police services, fostering an atmosphere of collaborative working.

CRER is aware of some positive steps in collaborative working between Police Scotland and the third sector. For example, in Glasgow, the Community Planning Partnership has made efforts to engage with minority ethnic communities in partnership with local minority ethnic voluntary sector organisations. Of particular note was an engagement meeting where a police officer was able to listen and respond to community concerns and individual complaints. As well as feeling that their voices had been heard, community members who had problems previously with the police services greatly appreciated the efforts of this officer to support them in addressing any outstanding issues. Whilst public bodies often dislike hearing negative messages from community members and therefore try to frame engagement as an improvement process, this open and honest dialogue was of far more benefit, as it allowed problems to be pinpointed and relationships to be mended.

It is important to note that police services should not only consult with community leaders, as this often leaves out significant portions of community, particularly minority ethnic women and young people. Engagement across and within communities is critical.

Furthermore, minority ethnic groups are not homogenous. Police services need to engage with all communities and not assume that the issues are the same across the board.

CRER believes that a partnership approach with the third sector can allow police services to learn from communities where failures have occurred and allows individuals to feel heard and understood by the police services.

However, there are also areas in which collaboration between Police Scotland and the third sector has weakened since the restructuring from the previous regional forces. Many minority ethnic community organisations report that whilst they used to have good relationships with Community Liaison Officers, these relationships have now broken down due to reassignment or changes in the work of the officer, and no other officer has replaced them.

We also know that in some areas, very detailed information on hate crime statistics (e.g. specific location of incidents) was previously provided at local level to assist public and voluntary sector agencies to plan responsive services and share information, however this good practice has now been rolled back. Transparent data collection, monitoring, and publication ensures that the third sector and police services are working with the same information to address issues which affect

communities.

E. Accountability - CRER agrees that by being transparent, accountable, and acting with integrity, fairness, and respect the police services can improve minority ethnic groups' confidence in policing. An important aspect of this is transparent data collection and publication and, critically, use of this data to address the concerns of minority ethnic groups.

CRER notes that on bodies such as Local Area Police Scrutiny Committees, there is a severe lack of minority ethnic representation, which limits accountability and transparency with communities. Furthermore, we are aware of a number of police steering groups that are not transparent with their agenda or membership. Publication of minutes and membership of these groups would be a significant step forward for accountability and transparency.

Following concerns raised regarding issues such as Stop and Search and an increased in armed police officers, the police services have a duty to guarantee new or changed policies are understood and accepted by communities. In our experience, police services have not always been receptive to concerns raised by minority ethnic communities. Police services must ensure that maintaining an open dialogue with communities is an aspect of the accountability priority and that constructive criticism is not met with indifference or defensiveness.

F. Adaptability – CRER believes that ongoing community engagement is critical to ensuring that police services are adaptable. Taking measures to improve the representation of minority ethnic groups within the police services should be an important aspect of this.

Indeed, while adaptability is necessary to create responsive services, Police Scotland needs to ensure that any changes to policy or practice are assessed for impact on minority ethnic communities through Equality Impact Assessment. The loss of relationships between community organisations and trusted Community Liaison Officers through the process of restructuring is one example of where a change has had unintended negative consequences, and all efforts should be made to anticipate and mitigate these.

2 Do the revised Strategic Police Priorities reflect the needs of your local community or the communities you serve?

Not Answered

Comments::

In general, we believe the revised Strategic Police Priorities do reflect the needs of minority ethnic communities. However, effectiveness and appropriateness of these revised priorities will be demonstrated by how well they are implemented.

While we believe revised priorities are representative of the needs and concerns of communities, they are also broad. As such, steps must be taken to engage and involve minority ethnic communities throughout the life of these priorities to ensure they are achieving their intended outcomes.

More engagement with communities directly is needed to evaluate these revised priorities. It may be useful to analyse the responses to this consultation from minority ethnic community groups in particular to determine whether there is a consultation gap. Further consideration of how best to engage communities in this and future consultations would be useful.

CRER would also like to note that the outgoing Strategic Police Plan stated a strategic priority to, "Make communities stronger and improve wellbeing by increasing police confidence and reducing fear of crime, making the new Police Service an exemplar of visible, ethnical, and responsive policing." Alongside this, there is a strategic objective to, "Increase public confidence in the police service by understanding and responding to the particular needs of Scotland's diverse communities." It would be useful to learn whether monitoring had been carried out regarding this objective and whether a baseline had been established against which the new strategic priorities could be measured.

Within the consultation document itself, CRER noted that none of the crime statistics given were disaggregated by ethnicity, alongside other equality characteristics. This would be useful information to provide for future consultations.

Additionally, we note the reference to the Fairer Scotland discussion as part of engagement with communities, but the absence of a mention of the Race Equality Framework for Scotland and its consultations. The Framework provided offered strong points on the priorities for minority ethnic communities in Scotland and was developed after sustained direct engagement with communities. Its inclusion would have been beneficial in framing the consultation on the revised priorities.

We would also like to acknowledge and express our appreciation for the strong forward to this consultation, which highlights the ambition to tackle inequality. We are hopeful that this commitment permeates throughout the strategic priorities and their delivery.

3 Do you have anything to add to our impact assessments?

Yes

Comments:

While CRER is pleased to see that the published impact assessment is reflective of our previous response, we are concerned that only selected elements were included.

In regard to hate crime, there was no mention of under-reporting in minority ethnic communities, nor information on how effectively hate crime is policed; only statistics were given. There was also no data on the successful prosecution of hate crimes. While this may be considered a matter for the COPFS, the rate of successful prosecutions is related to the quality of evidence gathered by the police services.

The race/ethnicity section also did not include information on racist incidents, BME deaths in police custody, or the fact that BME individuals believe they are more likely to experience harassment and violence than those from white ethnic backgrounds. Furthermore, information regarding ethnic representation in the

police service was not given. While this may be considered a matter for human resources, it is important as it is directly linked to minority ethnic communities' experience of policing in Scotland.

Finally, the section references views put forward through the Fairer Scotland discussion. CRER believes more details about this, particularly in reference to relationships between minority ethnic communities and police, are needed in the impact assessment for its inclusion to be meaningful and reflective of the police services' commitment to accountability.

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: