Equality Impact Analysis

Regulations for Police Constable: Qualifications for Appointment and Probationary Periods

Version 8 (April 2018)
Introduction

In 2016 the College of Policing conducted a public consultation on proposals for a Policing Education Qualifications Framework (PEQF). 3045 individual and 52 organisational responses to the consultation were received.

Revised proposals for three new entry routes into the rank of constable were presented to and formally approved by College Board in September 2016. These included:

- A Police Constable Degree Apprenticeship (PCDA) (level 6)
- A pre-join (level 6) degree in policing
- Degree holder entry route for holders of any other (level 6) degree

An Equality Impact Analysis (EIA) was also conducted on the PEQF and signed off by the College Board in September 2016. It was highlighted that the EIA would continue to be a living document to be reviewed and updated on an ongoing basis alongside the implementation of PEQF.

This report builds on that initial analysis.

The EIA includes a Mitigation Plan outlining how the College of Policing will build on the opportunities presented by the PEQF, as well as recommended actions to mitigate against any negative impacts. There are however some areas which will require significant development and will involve longer term planning.

Between 24 July and 18 August 2017 the College consulted with chief officers, Police Federation of England and Wales, police staff associations and the NCA on the proposed changes to qualifications for appointment and probationary periods. This resulted in 15 responses representing the views of 21 organisations that have further influenced this revision.

Additionally consultation on a position paper for the initial entry routes for police constable was also carried out in August; feedback from that consultation was being analysed at the time of this report, however findings which relate to equality have been considered in this report.

This EIA is focused on the impact of proposals to changes to Police Regulation 10, Annex BA and Police Regulation 12, Annex C.

Structure of the report

To enhance transparency and better inform the decision making process, the format is different from the previous iteration. The potential impact of each new entry route has been analysed in the context of feedback from the consultation, supported by any available data or evidence.

The first section looks at the Pre-Join Degree in Policing; the second section looks at the Degree-Holder entry route; the third addresses the Police Constable Degree Apprenticeship entry route and finally the report looks at additional feedback collected as part of the consultation process, which is linked to but falls outside the remit of this Analysis.

A Mitigation Plan is included at the end of the report outlining our recommendations for addressing some of the issues raised.
Proposals regarding changes to qualifications for appointment to the rank of constable - Pre-Join Degree in Policing

1. Pre-Join Degree in Policing

This is a three-year practice-based Degree in Professional Policing, based upon the national curriculum for the police constable role. The degree will be achieved prior to the candidate joining the police service. The professional benchmark upon joining the police service will be that new constable recruits in possession of a pre-join degree recognised by the College of Policing are, with minimal orientation, competent for professional deployment on an Independent Patrol Status basis. Entrants into the service via this route will be provided with appropriate opportunities during their period of probation to demonstrate further practical policing skills, so as to achieve (the remaining elements of) full operational competence. A successful recruit to the police service via this route will be subject to a two-year probationary period post-join, as specified in Police Regulations.

The College proposes to revise Regulation 10 Police Regulations; Annex BA Determination, through the insertion of additional subtext and criteria to the current list to define the qualification for entry via the pre-join degree in policing qualification at level 6.

The following looks at each protected characteristic and the potential impacts resulting from the introduction of a Pre-Join Degree in policing. Feedback from the consultation and any supporting evidence used have also been included to inform the mitigations and recommended actions.

1.1 Ethnicity

Potential Impact

There has been some progress in recruiting Black and Minority Ethnic (BAME) officers into policing with numbers rising from 2% in 1999 to 5.5% by 2015 (compared with 6.5% and 14% of the population respectively). However the persisting under-representation of officers from BAME backgrounds across forces in England and Wales remains and forces are being challenged by Police Vision 2025 to increase representation in terms of ethnicity.

Respondents to the consultation have expressed concerns as to whether introduction of the pre-join degree entry route will support forces to meet this challenge and suggested that recruiting through the pre-join route could potentially lead to a reduction in the numbers of Black and Minority Ethnic people joining policing.

With increasing numbers of BAME students attending university there is potential that recruiting through the pre-join route could lead to an increase in the numbers of Black and Minority Ethnic people joining policing.

These potential impacts are explored further below.

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1 https://publications.parliament.uk/pa/cm201617/cmselect/cmhaff/27/27.pdf
Consultation

The College of Policing response to the consultation on PEQF conducted in 2016\(^3\) highlighted concerns from respondents regarding proposals for a level 6 qualification as an entry requirement into policing. This, respondents said, could have a negative impact on recruitment of groups already under-represented within policing, in particular people from Black and Minority Ethnic Backgrounds.

This view was echoed by respondents to the 2017 consultation on proposed changes to regulations and again at the Equality Impact Assessment Consultation Event held on 30\(^{th}\) August 2017 and attended by 15 delegates (see appendix 3 for list of organisations in attendance), where participants again raised concerns that a higher level qualification requirement could decrease diversity across forces.

Early feedback from the consultation on initial entry routes further suggests that the pre-join degree is unlikely to increase the appeal of police service to currently under-represented groups.

Evidence and Data

The lack of diversity in officers across forces is an issue which has been evident for some time. In the Lammy Review it has been linked to poor community relationships between the police and BAME communities, which research has shown is partly due to the over-representation of BAME people within the Criminal Justice System; which in turns breeds mistrust for police within those communities.

| The Lammy Review (2017)\(^4\) | A review to make recommendations for improvement with the ultimate aim of reducing the proportion of BAME offenders in the criminal justice system. The review found that those who are charged, tried and punished are still disproportionately likely to come from minority communities. The review also found that Grievances over policing tactics, particularly the disproportionate use of Stop and Search, drain trust in the CJS in BAME communities. |
| House of Commons, HAC, Police Diversity (2017)\(^5\) | The report illustrates that some limited progress has been made in recruiting BME officers with numbers rising from 2\% in 1999 to 5.5\% by 2015 (compared |

\(^3\) College of Policing, Developing and delivering an education qualification framework for policing
\(^4\) The Lammy Review, An independent review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System, 2017
\(^5\) House of Commons Home Affairs Committee, Police diversity First Report of Session 2016–17
Conversely, research shows that the diversity within Higher Education Institutions is significantly higher than even the diversity within society.

<table>
<thead>
<tr>
<th>Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equality Challenge Unit (2015)(^6)</td>
<td>The Equality in higher education statistical report shows that the proportion of BME students in Higher Education has consistently increased over recent years, from 14.9% in 2003/4 to 20.2% a decade later (an increase of 5.3 percentage points).</td>
</tr>
<tr>
<td>Higher Education Funding Council for England (2015)(^7)</td>
<td>The Council have highlighted statistics which show that proportionally, BME students are over represented in HEIs making up 29% of all entrants to full-time first degrees in 2015-16, despite these groups making up just 18% of the 15-year-old population in the 2011 census in England.</td>
</tr>
</tbody>
</table>

**Mitigations and Recommended Actions**

The College sees real potential for the police service to attract recruits from all backgrounds, especially in terms of ethnicity, to better reflect the communities we serve, through the offer of a degree in policing in Higher Education. However as the Degree in Professional Policing will be a new course of study, there is work to be done to ensure we can capitalise on any throughput by engaging potential BAME students.

1. **It is recommended that the College initiates and works with an EIA Working Group to inform a better understanding of engaging protected groups and ensure that officers from protected groups are fully engaged with the PEQF programme.**

The PEQF evaluation strategy will require forces and higher education institutions to submit demographic data, to the College, including data on protected characteristics on candidates who join via the three new entry routes.

2. **It is recommended that data gathered be used to monitor and report on initial outcomes for protected groups who join through the three new entry routes.**

There must be a clear and strong emphasis on the promotion of equality, diversity and inclusion as part of PEQF implementation. The Trailblazer group (an initial group of pilot forces) is working to identify and share effective practice from early implementation programmes.

3. **It is recommended that the College initiates and works with an EIA Working Group to develop:**

   - a framework/toolkit for forces Equality Impact Analysis,

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\(^6\) Equality Challenge, Unit *Equality in higher education: statistical report Part 2: students* 2015

\(^7\) HEFCE, *Student Characteristics, 2015* [http://www.hefce.ac.uk/analysis/HEinEngland/students/](http://www.hefce.ac.uk/analysis/HEinEngland/students/)
• a POLKA PEQF EIA Community for networking and to share innovation.

1.2 Sex

Potential Impact

The Police Workforce England and Wales Statistical reports show that the number of women joining and progressing through the service has increased year on year.\(^8\)

With increasing numbers of women both joining policing and attending university, there is potential that recruiting through the pre-join route could lead to more women joining policing.

However if the pre-join entry route does not attract significant numbers of women it could lead to a decrease in the numbers of women joining policing.

These impacts are explored in greater detail below.

Consultation

Respondents to the consultation did not identify any impacts on gender for the pre-join degree route; more generally concern has been raised at the impact of the new and varying entry routes on current recruitment profiles.

“Given that the College’s proposals are intended to change the current recruitment programmes – how can the College presume that women joining and progressing will continue to increase year on year.”

Consultation Response

Evidence and data

Workforce data shows that the number of women joining the police service has increased year on year from 2006.

The picture in HEI’s is promising with a higher proportion of women attending university than men. However data on students who have completed available policing degrees is not available. Whether the pre-join degree in policing will be an attractive option for women attending universities is currently unknown.

Table 1, showing the proportion of police officers who are female, as at 31 March 2006 to 2015, England and Wales.  

<table>
<thead>
<tr>
<th>Year</th>
<th>Female Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>22.3%</td>
</tr>
<tr>
<td>2007</td>
<td>23.3%</td>
</tr>
<tr>
<td>2008</td>
<td>24.2%</td>
</tr>
<tr>
<td>2009</td>
<td>25.1%</td>
</tr>
<tr>
<td>2010</td>
<td>25.7%</td>
</tr>
<tr>
<td>2011</td>
<td>26.3%</td>
</tr>
<tr>
<td>2012</td>
<td>26.8%</td>
</tr>
<tr>
<td>2013</td>
<td>27.3%</td>
</tr>
<tr>
<td>2014</td>
<td>27.9%</td>
</tr>
<tr>
<td>2015</td>
<td>28.2%</td>
</tr>
</tbody>
</table>

Research concludes that there is a significantly higher proportion of women attending universities than men.

Equality Challenge Unit (2015) The statistical report states that: ‘there has consistently been a higher proportion of female students than male students. While the proportion of men has gradually increased from 42.7% in 2003/04 to 43.9% in 2013/14, there remained a difference of 12.2 percentage points between male and female representation.’

Mitigations and recommended actions

Progress has been made in terms of attracting women into policing. Additionally the significant numbers of women attending universities presents opportunities for targeted promotion of the pre-join degree in policing to that group.

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9 National Statistics Police workforce, England and Wales 2015  
4. In support of this the College will establish and facilitate an online EIA community as a mechanism for the collection, analysis and dissemination of case studies and examples of good practice.

1.3 Age

Impact

There is concern raised by respondents, that the pre-join degree in policing will be more attractive to younger applicants under 25 and, and could therefore disadvantage older applicants who may not be able to afford to undertake a degree.

This impact is explored further below.

Consultation

Participants at the EIA Consultation Event expressed concern that older applicants, many of whom would have caring responsibilities and could not afford to spend three years completing and also paying for a degree, would be excluded from this entry route. The route was seen as much more attractive to young people.

It was also suggested that other entry routes which offer the opportunity to earn from day one like the Police Constable Degree Apprenticeship and the Degree-Holder entry routes, would be far more attractive and that there may not be significant appetite for a pre-join degree in policing.

Further concern was raised at the requirement to work as a constable whilst completing the pre-join degree. Respondents were concerned that working as a Special Constable would reduce the opportunity to undertake paid work, which many student do to supplement their income. This it was felt would limit opportunities for those who had financial responsibilities including older candidates.

Evidence and Data

SEARCH data indicates that of those interested in becoming officers 51.4% are aged 25 and under compared to 48.5% aged 26 and over.

| Table 2 SEARCH Assessment data on age August 2015 – February 2017 |
|------------------------|--------|--------|--------|--------|
| Under 20              | 21-25 | 26-30  | 31-34  | 35 and over |
| 9.2%                  | 42.2% | 26.1%  | 10.2%  | 12.3%   |

Data on the age profile of full time HEI students shows that over half are aged 18 and under and just over 10% are aged 25 and over. However the data on part time students shows a marked increase with 69% of students aged 25 and over.

10 SEARCH Assessment Centre Data on Age 2017
Table 3 - Percentage of first year UK domiciled undergraduate students by age, level of study and mode of study 2015/16

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Full-time</th>
<th>Part-time</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>18 and under</td>
<td>50.3%</td>
<td>3.5%</td>
<td>45.5%</td>
</tr>
<tr>
<td>19</td>
<td>22.1%</td>
<td>3.4%</td>
<td>20.2%</td>
</tr>
<tr>
<td>20</td>
<td>7.3%</td>
<td>4.3%</td>
<td>7.0%</td>
</tr>
<tr>
<td>21-24</td>
<td>9.9%</td>
<td>19.8%</td>
<td>10.9%</td>
</tr>
<tr>
<td>25-29</td>
<td>4.2%</td>
<td>20.6%</td>
<td>5.9%</td>
</tr>
<tr>
<td>30 and over</td>
<td>6.3%</td>
<td>48.4%</td>
<td>10.5%</td>
</tr>
<tr>
<td>Total</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Percentages are not subject to rounding. See data intelligence. § Figures include only those students whose age is known.

Mitigations and Recommended Actions

The PEQF programme aims to provide entrants to policing with flexibility and choice, hence the provision of three new entry routes. The degree holder entry route and the Police Constable Degree Apprenticeships (see detail below) provide alternative entry routes for those including older applicants for whom the pre-join degree may not be a viable option.

As the majority of part time students are aged 25 and over it would appear that this is a popular form of study for that age group and the offer of part-time places could potentially encourage older learners to undertake the pre-join degree.

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data to the College, including data on age, for all pre-join degree entrants/candidates.

See Recommendation 2

1.4 Sexual Orientation

Impact

The impact of the pre-join degree in policing on applicants from LGBT+ backgrounds is unknown at present.

Consultation

None of the consultation respondents identified potential impacts for LGBT+ individuals or communities.

Evidence and data

“There is limited data and/or research into LGBT+ officers in England and Wales. This data is currently not collected centrally.

Data collected from the SEARCH Centres gives an indication of the numbers of LGBT+ (potential) applicants; however a number of participants ‘preferred not to say’ what their sexuality is and a large number of attendees did not complete the biographical data form. Further, it is not known how many of any specific sexual orientation group go on to successfully become police officers.

Table 4, SEARCH Assessment Centre data on sexual orientation of participants

<table>
<thead>
<tr>
<th>Assessment Centre Date</th>
<th>Total number Attended</th>
</tr>
</thead>
<tbody>
<tr>
<td>31st August 2015 – 28th February 2017</td>
<td>18204</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sexuality</th>
<th>Total declared</th>
<th>Percentage *</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bisexual</td>
<td>434</td>
<td>2.4 %</td>
</tr>
<tr>
<td>Heterosexual</td>
<td>13211</td>
<td>72.6 %</td>
</tr>
<tr>
<td>Gay/Lesbian</td>
<td>614</td>
<td>3.4 %</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>1103</td>
<td>6.1 %</td>
</tr>
<tr>
<td>Did not complete</td>
<td>2842</td>
<td>15.6%</td>
</tr>
</tbody>
</table>

*Percentages have been rounded to the nearest decimal point

Mitigations and Recommended Actions

The data suggest that a higher proportional percentage of LGB (5.8%) are applying (through SEARCH) to become officers, than there are in the general population (1.7%). However the numbers who go on to become officers is not known and this is compounded by the lack of centrally collected data on the sexuality of serving officers.

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data to the College, including data on sexual orientation for all pre-join degree entrants/candidates to the College.

See Recommendations 1 and 2.

12 SEARCH Assessment Centre Data on Sexual Orientation 2017
1.5 Religion and Belief

Impact

Recruiting through the pre-join degree entry route could impact the number of officers from minority religious backgrounds.

This impact is explored further below.

Consultation

Consultation respondents did not identify any potential impacts for individuals or groups from religious or non-faith backgrounds. However feedback gathered through discussion with the Staff Associations suggests that policing is not widely seen as a profession of choice for some communities and Jewish and Muslim communities were specifically mentioned.

The College also acknowledges the concerns raised by respondents about student loans and the non-compliance with Sharia law, which could impact on the ability of Muslim candidates to attend university.

Evidence and Data

The SEARCH data on religion presented in table 5 below show small numbers of Jews attending the Assessment Centre between 2015 and 2017; they make up only .24% of all attendees whilst Jewish communities make up 0.5% of the U.K population. Muslim attendees make up 6.4% of all candidates but only 4.8% of the population.

The SEARCH data does not tell us how many of the successful applicants go on to become officers but it does give an indication (in the absence of other data) of the religious demographics of those who are interested in becoming officers.

The data from the Office of National Statistics (table 6) gives a national picture of religion and belief.

<table>
<thead>
<tr>
<th>Assessment Centre Date</th>
<th>Total number Attended</th>
<th>Religion</th>
<th>Total declared</th>
<th>Percentage*</th>
</tr>
</thead>
<tbody>
<tr>
<td>31st August 2015 – 28th February</td>
<td>18204</td>
<td>Buddhist</td>
<td>70</td>
<td>0.4%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Christian</td>
<td>6341</td>
<td>34.8%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Hindu</td>
<td>147</td>
<td>0.8%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Jewish</td>
<td>44</td>
<td>0.2%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Muslim</td>
<td>1169</td>
<td>6.4%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sikh</td>
<td>178</td>
<td>0.9%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Other</td>
<td>135</td>
<td>0.7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No Religion</td>
<td>7177</td>
<td>39.4%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Prefer not to say</td>
<td>1099</td>
<td>6.0%</td>
</tr>
</tbody>
</table>
Table 6, Census data on Minority religious groups, England and Wales, 2011

Mitigations and Recommended Actions

A strategic aim of the PEQF is to support the professionalization of policing in England and Wales. It is anticipated that this may encourage more applicants from a wider range of communities to apply.

There is further work to be done around engaging communities currently under represented in policing (BAME and women) and promoting policing as a career to them. Whilst other protected characteristic groups may also be under-represented there is no data to confirm what the current demographic breakdown looks like. The gathering of data on new entry route candidates will allow the College to start to pull together a more comprehensive picture.

There is some work to be done around promoting policing as a career of choice to all religious minority groups. See Recommendation 4

5. The Government is working to develop a Sharia compliant loan system for students and it is recommended that the College monitor these developments and keep forces informed of any progress made.
1.6 Disability

Impact

People with learning difficulties could be disadvantaged by the pre-join degree and associated academic requirements.

This impact is explored further below.

Consultation

Respondents to the consultation were concerned about reasonable adjustments to support those with learning difficulties and/or disabilities in particular those with dyslexia and Asperger’s. Respondents also gave anecdotal evidence that there appears to be a significant number of officers with these conditions, however there is no official data to confirm the exact numbers.

Evidence and Data

There is no official data on the number of officers with dyslexia or any other learning difficulty and/or disability; dyslexia data on the general population is also limited. However according to the British Dyslexic Association up to 10% of the population has dyslexia.\textsuperscript{13}

There is on the other hand, data available on the number of students with learning difficulties and disabilities. Data published by the Higher Education Funding Council shows that:

\textit{The most common type of disability is a specific learning difference, such as dyslexia, dyspraxia or Attention Deficit Hyperactivity Disorder. In 2015-16, almost half of those students with a known disability who started a higher education programme had a specific learning difference.}\textsuperscript{14}

Mitigations and Recommended Actions

There will inevitably be a proportion of candidates studying on the pre-join degree in policing who will have a learning difficulty or disability and who will require some form of reasonable adjustment to assist them with their study. The reasonable adjustment duty within the Equality Act 2010 places a requirement on Higher Education providers to:

- \textit{To take such steps as it is reasonable to have to take to avoid the substantial disadvantage where a provision, criterion or practice puts disabled students at a substantial disadvantage.}

- \textit{To take such steps as it is reasonable to have to take to avoid the substantial disadvantage where a physical feature puts disabled persons at a substantial disadvantage; this includes removing the physical feature in question, altering it or providing a reasonable means of avoiding it.}

\textsuperscript{13} http://www.bdadyslexia.org.uk/about  
\textsuperscript{14} HEFCE Student Characteristics 2016  
http://www.hefce.ac.uk/analysis/HEinEngland/students/disability/
Higher Education Institutions do provide a range of reasonable adjustments for those with learning difficulties and/or disabilities.

6. Further, the College of Policing National Programme Specification for the degree in policing will include requirements for force and higher education collaborative providers to ensure all students are provided with a handbook detailing the support available to them, including reasonable adjustments. The provision of such support will also need to be evidenced by degree providers and monitored as part of the quality assurance arrangements for the College approval process.

1.7 Other Protected Characteristics (Gender Reassignment, Marriage/Civil Partnership, Pregnancy/Maternity)

Potential Impact

The impact of the pre-join degree in policing entry route in policing on applicants with other protected characteristics including Gender Reassignment, Marriage or Civil Partnership, Pregnancy/Maternity is unknown at present.

Consultation

None of the consultation respondents identified potential impacts for other protected characteristics.

Evidence and data

Research did not identify any evidence or data on the career destinations of degree holders with other protected characteristics or any other official evidence which could inform this section of the EIA.

Mitigations and Recommended Actions

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, to the College including data on Gender Reassignment, Marriage or Civil Partnership, Pregnancy/Maternity, for all degree holder entrants/candidates to the College.

See Recommendation 2

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1.8 Socio Economic Status

Potential Impact

Concerns have been expressed by respondents to the consultation on Initial Entry routes concern that the pre-join degree in policing will be less accessible to people from poorer communities.

Consultation

Respondents felt that the pre-join entry route might limit the opportunity for students from disadvantaged backgrounds to join via this route. The requirement to work voluntarily as a special constable was felt to compound the issue as pre-join students would also have limited availability for part-time work to supplement incomes.

Evidence and data

Workforce data relating to socio-economic status is not currently collected by forces across England and Wales, therefore there are no relevant police workforce statistics to reference.

Figures produced by the Department for Business Innovation and Skills and the Department for Education show that those from poorer backgrounds are less likely to attend university than those from richer backgrounds.

<table>
<thead>
<tr>
<th>Department for Business Innovation and Skills 2014</th>
<th>21% of Free School Meals (an indicator for low family income) students progress into Higher Education compared with 39% of non-Free School Meals students; a difference of 18 percentage points.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department for Education, 2017</td>
<td>An estimated 24% of pupils who were in receipt of Free School Meals (FSM) aged 15 entered Higher Education by age 19 by 2014/15. This compares to 41% of non-FSM pupils. The gap in progression rates between FSM and non-FSM pupils rose slightly, from 17 to 18 percentage points between 2013/14 and 2014/15. The gap has varied between 17 and 19 percentage points since 2005/06.</td>
</tr>
</tbody>
</table>

Mitigations and Recommended Actions

Whilst workforce data on socio-economic background/status for forces is not currently collected, Higher Education Institutions have started to collect this data for students following introduction of the strategic objective across HE to widen participation from all disadvantaged groups.\(^\text{16}\) With the introduction of the Pre-Join we will be able to start to build a picture of the socio-economic backgrounds of pre-join candidates.

\(^{16}\) http://www.hefce.ac.uk/sas/
As noted above (1.3) the PEQF programme aims to provide entrants to policing with flexibility and choice, hence the provision of three new entry routes. The degree holder entry route and the Police Constable Degree Apprenticeships (see detail below) provide alternative entry routes for those including older applicants for whom the pre-join degree may not be a viable option. In particular the PCDA by presenting the opportunity to earn whilst working towards the qualification has the potential to attract those from poorer backgrounds who may not be able to afford to pay for a degree.

Based on feedback from the consultation on Initial Entry Routes, the College has reviewed the requirement to work as a Special Constable as part of the pre-join entry route. The pre-join will be a knowledge based degree, aimed at maximising professional choice of police forces and potential candidates. There will no longer be a compulsory requirement for pre-join candidates to be special constables, but a more flexible approach allowing individuals and forces to choose whether or not to include special constabulary component.

7. As part of the PEQF evaluation, the College will track and monitor backgrounds of applicants through the data being collected by Higher Education Institutions.
Proposals regarding changes to qualifications for appointment to the rank of constable - Degree Holder Entry Route for holders of any other (level 6) degree

2. Degree Entry Route

This entry route is intended for graduates who have already achieved a level 6 degree qualification, other than the College of Policing approved degree in policing specified above.

An entrant to the police service via this route will be subject to a two-year probationary period, as specified in Police Regulations.

The College proposes to revise Regulation 10 Police Regulations; Annex BA Determination through the insertion of additional subtext and criteria to the current list to define the qualification for entry via the degree holder entry route in the form of requirement for a level 6 degree qualification.

The following looks at each protected characteristic and potential impacts resulting from the introduction of a Degree-Holder entry route into policing. Feedback from consultation and any supporting evidence used have also been included which inform the mitigations and recommended actions.

2.1 Ethnicity

Potential Impact

With a growing number of BAME students attending university there will be growing numbers of BAME degree-holders for whom this entry route could be attractive and the degree holder route could lead to an increase in the number of Black and Minority Ethnic people applying to become officers.

Concerns have been expressed that a level six degree qualification entry requirement could be a barrier for BAME applicants and could lead to a reduction in the number of applicants from those communities.

These impacts are explored further below.

Consultation

As highlighted above the consultation revealed general concerns about the requirement to have a level 6 degree qualification, whether that be the pre-join degree, the degree holder entry route or by means of the PCDA, and the potentially adverse impact on minority ethnic groups.

Specific to the degree holder entry route, respondents asked for evidence that this entry route has the potential to attract diverse communities into policing.
Evidence and data

There is currently no robust evidence to give an indication of what type of candidates the degree-holder entry route will attract but Table 7 below shows healthy numbers of BAME students at university indicating that there is a growing pool of BAME candidates who would be eligible for the degree-holder entry route.

Table 7 Percentage of first year UK domiciled ethnic minority HE students by level of study and mode of study 2015/16

<table>
<thead>
<tr>
<th>Study Level</th>
<th>Mode of Study</th>
<th>First degree</th>
<th>Other undergraduate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Full-time</td>
<td>Part-time</td>
</tr>
<tr>
<td>First degree</td>
<td></td>
<td>25.9%</td>
<td>13.4%</td>
</tr>
<tr>
<td>Other undergraduate</td>
<td></td>
<td>21.3%</td>
<td>14.6%</td>
</tr>
</tbody>
</table>

The SEARCH data also suggest that many of the BAME candidates who go through the Assessment Centre already hold qualifications at level 6 and above.

Table 8 SEARCH candidate data on Police SEARCH Recruit Assessment Centre broken down by highest level of academic attainment

<table>
<thead>
<tr>
<th>Highest Level of Academic Attainment</th>
<th>White candidates</th>
<th>Black candidates</th>
<th>Asian candidates</th>
<th>Mixed candidates</th>
<th>Chinese candidates</th>
<th>'Other' candidates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Postgraduate</td>
<td>288</td>
<td>16</td>
<td>58</td>
<td>11</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td>Graduate</td>
<td>3032</td>
<td>82</td>
<td>246</td>
<td>115</td>
<td>14</td>
<td>42</td>
</tr>
<tr>
<td>A Level</td>
<td>3131</td>
<td>49</td>
<td>222</td>
<td>118</td>
<td>4</td>
<td>35</td>
</tr>
<tr>
<td>GCSE</td>
<td>1003</td>
<td>19</td>
<td>65</td>
<td>34</td>
<td>2</td>
<td>18</td>
</tr>
<tr>
<td>No formal qualifications</td>
<td>45</td>
<td>0</td>
<td>4</td>
<td>0</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Total number attended</td>
<td>10777</td>
<td>322</td>
<td>1030</td>
<td>393</td>
<td>40</td>
<td>178</td>
</tr>
</tbody>
</table>

17 HESA Student data Tables 2015-16
18 SEARCH Assessment Centre Data on academic levels of achievement 2016
Mitigations and Recommended Actions

To support forces in their aim to recruit from the widest talent pool possible, the College has proposed changes to ensure that the revised determination includes the opportunity to attract applications from those who would otherwise be eligible to join the service but who hold a level 6 degree qualification gained outside of the U.K. A proportion of this pool will come from BAME backgrounds.

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, for all degree holder entrants/candidates, to the College.

**See Recommendation 2.**

### 2.2 Sex

**Potential Impact**

A majority of women who have gone through the SEARCH Assessment Centre already have a degree, indicating that the Degree-Holder entry route could be a viable route into policing for female degree-holders and could increase numbers.

This impact is explored further below.

**Consultation**

The consultation did not identify specific impacts relating to gender and the degree holder entry route, however the consultation response noted in 1.2 is also relevant here in terms the impact of a new entry route on current recruitment gender profiles.

**Evidence and data**

Figures published by UCAS show that there are significantly more women attending university than men.\(^{19}\) The figures also show that the men are still dominating traditionally male areas such as engineering and some sciences, whilst women continue to significantly outnumber men in areas such as nursing, psychology, teaching and social work.

**Table 9 UCAS End of Cycle data resources, Acceptances by sex\(^ {20}\)**

<table>
<thead>
<tr>
<th>Sex</th>
<th>Number of Acceptances by Cycle Year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2013</td>
</tr>
<tr>
<td>Men</td>
<td>222,070</td>
</tr>
<tr>
<td>Women</td>
<td>273,530</td>
</tr>
<tr>
<td>Total</td>
<td>495,595</td>
</tr>
</tbody>
</table>

\(^{19}\) End of cycle data sources 2016, acceptances by detailed subject group and sex 2016
[https://www.ucas.com/file/84376/download?token=VJU5c7dy](https://www.ucas.com/file/84376/download?token=VJU5c7dy)

Table 10 Acceptances by detailed subject group and sex

<table>
<thead>
<tr>
<th>Subject Group (detailed Level), Sex</th>
<th>Number of Acceptances by Cycle Year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2013</td>
</tr>
<tr>
<td>Nursing Men</td>
<td>2190</td>
</tr>
<tr>
<td>Nursing Women</td>
<td>22510</td>
</tr>
<tr>
<td>Psychology Men</td>
<td>3645</td>
</tr>
<tr>
<td>Psychology Women</td>
<td>14465</td>
</tr>
<tr>
<td>Mathematics Men</td>
<td>4865</td>
</tr>
<tr>
<td>Mathematics Women</td>
<td>2835</td>
</tr>
<tr>
<td>General Engineering Men</td>
<td>3160</td>
</tr>
<tr>
<td>General Engineering Women</td>
<td>605</td>
</tr>
<tr>
<td>Computer Science Men</td>
<td>12545</td>
</tr>
<tr>
<td>Computer Science Women</td>
<td>1850</td>
</tr>
<tr>
<td>Social Work Men</td>
<td>1620</td>
</tr>
<tr>
<td>Social Work Women</td>
<td>10955</td>
</tr>
<tr>
<td>Training Teachers Men</td>
<td>1230</td>
</tr>
<tr>
<td>Training Teachers Women</td>
<td>5695</td>
</tr>
</tbody>
</table>

Mitigations and Recommended Actions

A growing number of women in higher education indicates that there is a significant pool of women for whom the degree entry route would be a viable option; however the majority of women attending university are concentrated in gender stereotypical areas of study. There remains a question of how we encourage female degree holders to consider a career in policing and whether the pre-join will be dominated by male candidates.

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, to the College for all degree holder entrants/candidates, to the College.

See Recommendations 1 and 2.

2.3 Age

Potential Impact

The impact of the degree entry holder entry route on the age profile of police entrants is not known at this stage, however the degree entry route is intended to be a viable option for entrants who already hold a degree qualification.

Consultation

None of the consultation responses or respondents identified potential impacts from the degree holder entry route on the age profile of entrants. However the currency of degrees was questioned by respondents, who requested guidance on the length of time a degree would be seen as valid alongside relevant experience and relevant expertise.

https://www.ucas.com/file/84376/download?token=VJU5c7dy
Evidence and data

The tables on age of officers by rank do give a picture of the current ages profile on constables.

Research did not uncover any official data or evidence on the numbers of degree holders joining the police as constables but the SEARCH data presented in table 8 could give an indication of the age of candidates this route is likely to attract.

Table 11 Age of police officers*, by rank, as at 31 March 2016

<table>
<thead>
<tr>
<th>Rank</th>
<th>Under 26</th>
<th>26 to 40</th>
<th>41 to 55</th>
<th>Over 55</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Constable</td>
<td>5,414</td>
<td>54,120</td>
<td>40,599</td>
<td>1,195</td>
<td>101,328</td>
</tr>
</tbody>
</table>

*Excludes officers seconded out to central services (e.g. the Home Office, the National Crime Agency).

Mitigations and recommended Actions

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, to the College, for all degree holder entrants/candidates, to the College.

See Recommendation 2

8. The College will issue guidance on the currency of degrees and relevance of candidate experience with reference to the degree-holder entry route as part of the Transition Guidance which is in development.

2.4 Other Protected Characteristics (Sexual Orientation, Religion/Belief, Gender Reassignment, Disability, Marriage or Civil Partnership, Pregnancy/Maternity)

Potential Impact

The impact of the degree holder entry route in policing on applicants with other protected characteristics including Sexuality, Religion/Belief, Gender Reassignment, Disability, Marriage or Civil Partnership, Pregnancy/Maternity is unknown at present.

Consultation

None of the consultation respondents identified potential impacts for other protected characteristics.

22 Home Office open data tables; Age of the workforce, England and Wales, year ending 31 March 2016
Evidence and data

Research did not identify any evidence or data on the career destinations of degree holders with other protected characteristics or any other official evidence which could inform this section of the EIA.

Mitigations and Recommended Actions

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, to the College, including data on Sexuality, Religion/Belief, Gender Reassignment, Disability, Marriage or Civil Partnership, Pregnancy/Maternity, for all degree holder entrants/candidates to the College.

See Recommendation 2.
Proposals regarding changes to probationary periods for constables - Police Constable Degree Apprenticeship (PCDA)

3. Proposed changes to probationary periods

The Police Constable Degree Apprenticeship (PCDA) as prescribed in the nationally-approved apprenticeship standard, is three years in duration and will involve successful completion of a Degree in Professional Policing Practice in order for the apprentice to be confirmed in post. A national apprenticeship standard has been developed, setting out the occupational profile for the role of police constable.

This will be a professional degree very much founded upon effective professional performance as an integral part of academic achievement of the degree itself.

The probationary period for a constable is two years.

The College therefore proposes revisions to Regulation 12 Police Regulations; Annex C Determination to reflect the 3 year probationary period necessary for entry via police constable degree apprenticeship route and offer further clarity in these arrangements regarding full time and part time working:

The following looks at each protected characteristic and the potential impacts resulting from the introduction of a PCDA. Feedback from consultation and any supporting evidence used have also been included to inform the mitigations and recommended actions.

3.1 Ethnicity

Potential Impact

The Government has committed to increasing the proportion of apprentices from BAME backgrounds by 20% and have put initiatives in place to support this aim in their 2020 vision, which encourages a drive towards more engagement with BAME communities in addition to targeted information and support.

This commitment is in response to ongoing concerns about the poor outcomes of BAME apprentices when compared to white apprentices and suggests that the PCDA could lead to a decrease in the numbers of successful BAME entrants completing the apprenticeship.

Consultation

Respondents did not raise specific concerns about the potential impact of the PCDA entry route on candidates from BAME backgrounds but there was general concern from respondents that a level six qualification (PCDA included) could potentially discourage already under-represented groups including those from BAME backgrounds from joining policing.
The extended probationary period respondents feel would mean an increased risk of candidates being dismissed under Regulation 13 and that this is likely to have a negative impact on diversity and representation across forces.

“It is [our] view that the introduction of a 3 year probationary period will potentially actually discriminate against those whom the introduction of the PCDA is intended to benefit.”

Respondent

Evidence and Data

Degree Apprenticeships were launched in 2015, with early adopters beginning delivery in 2017; data on these apprenticeships was not yet available at the time of this EIA. Data on general apprenticeships has been used as a comparator.

We found very little recent research around ethnicity and apprenticeships but the evidence available indicates that there are issues around access to apprenticeships for BAME people and further issues relating to the progression and success of BAME apprentices.

<table>
<thead>
<tr>
<th>TUC 2016</th>
<th>The employment gap between BME workers and white workers who have completed Apprenticeships stands at 23 per cent.23</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Assembly 2017</td>
<td>In London where there are significant numbers of BAME apprentices, research found that BAME apprentices are more likely to work in the low-paid health and retail sectors</td>
</tr>
</tbody>
</table>

The Government has responded in English Apprenticeships, Our 2020 Vision outlining a range of initiatives aimed at increasing BAME apprentices

| Department for Business Innovation and Skills 2015 | Action will include: Establishing a network of apprenticeship diversity ‘champions’ from employers and training providers committed to achieving greater diversity in apprenticeships; Ensuring that the new campaign on youth employment includes targeted material for BAME audiences; Working with Local Enterprise Partnerships and other stakeholders to increase understanding of BAME employers’ specific recruitment needs, and to encourage and support employers to diversify their workforce by taking on BAME apprentices. |

Mitigations and Recommended Actions

In support of the government’s commitment in its ‘2020 vision’, The Apprenticeship Diversity Champions Network (ADCN) has been established to champion apprenticeships and diversity amongst employers and encourage more people from underrepresented groups to consider apprenticeships.

9. It is recommended that the College seeks to join the ADCN to champion the PCDA to underrepresented groups.

10. The College is currently working closely with the Education and Skills Funding Agency and their National Apprenticeship Service to develop and deliver initiatives aimed at engaging candidates from BAME backgrounds with the PCDA. The first of these initiatives will be a widening participation in apprenticeships event, planned for March 2018 and future initiatives will be added to the mitigation plan when agreed.

It is unclear which protected groups would be impacted by the extended probationary period and risk of dismissal under regulation 13. Outcomes for all protected groups undertaking a PCDA will be monitored as part of the PEQF evaluation, See Recommendation 2.

3.2 Sex

Potential Impact

There has been ongoing debate about the under-representation of women in apprenticeships and in particular, those apprenticeships which are seen as to be typically ‘male’ vocations.24

Additionally the longer probationary period could discourage those with familial and/or caring responsibilities who will be seeking financial security; as women make up the majority of this pool this entry route could potentially be less attractive to women.

Consultation

Respondents did not raise specific concerns about the potential impact of the PCDA entry route on candidates based on sexual orientation

Evidence and Data

The Home Office Police Workforce England and Wales Statistical reports25 show that the number of women joining and progressing through the service has increased year on year. However we cannot assume that what has worked for previous entry routes will have similar success with the new PCDA and available data does indicate that apprenticeships can be gender biased.

24 Young Women's Trust, Making Apprenticeships Work for Young Women, 2016
25 Home Office, Police Workforce England and Wales, Statistics 2017
The Education and Skills Funding Agency’s Equality and Diversity 14/15 reports shows that whilst the majority of younger apprentices are male, there are significant numbers of women undertaking apprenticeships at all ages and a majority of apprentices over 25 are women.

Table 12 Apprentices aged 19 and under

<table>
<thead>
<tr>
<th></th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>82,710</td>
<td>111,400</td>
</tr>
<tr>
<td></td>
<td>42.6%</td>
<td>57.4%</td>
</tr>
</tbody>
</table>

Table 13 Apprentices aged 19-24

<table>
<thead>
<tr>
<th></th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>144,810</td>
<td>170,230</td>
</tr>
<tr>
<td></td>
<td>46%</td>
<td>54%</td>
</tr>
</tbody>
</table>

Table 14 Apprentices aged 25+

<table>
<thead>
<tr>
<th></th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>220,070</td>
<td>142,540</td>
</tr>
<tr>
<td></td>
<td>60.7%</td>
<td>39.3%</td>
</tr>
</tbody>
</table>

Mitigations and Recommended Actions

The work the College is doing with the Education and Skills Funding Agency outlined in Recommendation 9 will support greater engagement with female apprentices and specific activities will be added to the mitigation plan once agreed. It is also expected that joining the ACDN will support efforts to attract more female candidates to the PCDA.

See Recommendation 4.

3.3 Age

Potential Impact

Apprenticeships appear to have inherited a reputation of being for young people only and the term has long been associated with ‘junior’ status. Certainly the Government’s focus until recently has been on getting more young people into apprenticeships and this has reinforced those perceptions; as such we must recognise the appeal of the PCDA to younger candidates.

Further a full time Police Constable on the PCDA entry route, will be on probation for 3 years and this may be seen as too long a probationary period for older applicants, many of whom will be seeking financial security.

The PCDA wage could also be a crucial factor in determining who takes up this entry route and it is likely that a lower wage would again only appeal to younger candidates.

26 Skills Funding Agency and Department for Education, Equality and Diversity 14/15 Reports Final, 2015
Recruiting through the PCDA could lead to a reduction in the number of older people (aged 25+) joining policing.

These impacts have been explored further below.

**Consultation**

The PCDA presents an opportunity for candidates to earn as they learn but there is concern that if the pay band for constables is set lower than current starting rates, many older people will be discouraged from joining policing.

Some respondents also shared the view that apprentices were for young people and that the PCDA is likely to attract a higher proportion of young people; in some instances the potential influx of young people was cautiously welcomed:

>'Concerned that Apprentices will tend to be younger which bring in knowledge and skills around working with technology but don't always have the people skills which may come with age and life experience.'

Respondent

**Evidence and Data**

Figures from the Department of Education and Skills Funding Agency for 2014/5 on apprenticeships participation by age show that apprentices over 25 make up the largest group of apprentices.

**Table 15 Apprenticeship participation by age**

<table>
<thead>
<tr>
<th>Under 19</th>
<th>19-24</th>
<th>25+</th>
</tr>
</thead>
<tbody>
<tr>
<td>194,110</td>
<td>315,040</td>
<td>362,620</td>
</tr>
</tbody>
</table>

**Mitigations and Recommended Actions**

The opportunity to earn whilst learning and achieve a level 6 degree qualification upon completion of the apprenticeship may be an attractive option for older candidates, dependent upon the outcomes of the current Pay Review. At the time of writing we are still awaiting outcomes from this review and we are therefore unable to conduct an analysis on what the potential impacts are likely to be. The College will update the EIA following publication of results from the Pay Review.

**See Recommendation 2.**

11. The College recognises that apprenticeship promotional campaigns including National Apprenticeship Week are very focussed on engaging young people. As such the College will continue to work with the Education and Skills Funding Agency to develop specific promotional materials targeting older apprentices and supporting forces in promotion of the PCDA to specific groups.
3.4 Disability

Potential Impact

Joiners with learning difficulties could be discouraged by the requirement to achieve a level 6 qualification; in particular people with dyslexia (which affects approximately 1 in 10 people in the U.K\textsuperscript{27}) may struggle where reasonable adjustments are not in place.

This impact is explored further below.

Consultation

Respondents questioned the level of reasonable adjustment which would be available for joiners with learning difficulties. There was also general concern that disability was not prioritised alongside other protected characteristics.

Evidence and Data

As indicated above there is no official data on the number of officers with learning difficulties and/or disabilities.

The Department for Education and the Skills Funding Agency’s Equality and Diversity reports for 2014/15\textsuperscript{28}, present figures for the numbers of apprentices with a known learning difficulty or disability; however the data is not broken down by type of learning difficulty or disability, so it has not been possible to determine the number of apprentices with specific conditions like dyslexia from this data.

Mitigations and Recommended Actions

See Recommendation 6.

3.5 Other Protected Characteristics (Sexuality, Religion/Belief, Gender Reassignment, Marriage or Civil Partnership, Pregnancy/Maternity)

Potential Impact

The impact of the PCDA entry route in policing on applicants with other protected characteristics including Sexuality, Religion/Belief, Gender Reassignment, Marriage or Civil Partnership, Pregnancy/Maternity is unknown at present.

Consultation

None of the consultation respondents identified potential impacts for other protected characteristics.

\textsuperscript{27} http://www.bdadyslexia.org.uk/about
\textsuperscript{28} The Department of Education and the Skills Funding Agency, Equality and Diversity Report, Final 2015
Evidence and data

Research did not identify any evidence or data on the other protected characteristics or any other official evidence which could inform this section of the EIA.

Mitigations and Recommended Actions

As part of the PEQF evaluation, forces and higher education institutions will be required to submit demographic data, to the College, including data on Sexuality, Religion/Belief, Gender Reassignment, Marriage or Civil Partnership, Pregnancy/Maternity, for all PCDA candidates, to the College.

See Recommendation 2.

3.6 Socio Economic Status

Potential Impact

The opportunity to earn as you learn presented by the PCDA, ensures that those from poorer backgrounds, who may not be able to afford to undertake the pre-join can still join policing. As it is unclear what the current workforce looks like in terms of socio-economic status/background, it is impossible to say whether the PCDA will increase/decrease the number of applicants from any background.

Consultation

As noted above (1.3), it has also been suggested by respondents to the consultation on proposed changes to Police Regulations that the Police Constable Degree Apprenticeship and the Degree-Holder entry routes would be far more attractive and that there may not be significant appetite for a pre-join degree in policing.

Evidence and data

The All Party Parliamentary Group on apprenticeships recommended that more should be done to encourage those in underrepresented sectors to take on an apprentice, particularly [among others] those from lower socio-economic backgrounds.29

Mitigations and Recommended Actions

Whilst workforce data on socio-economic background/status for forces is not currently collected, Higher Education Institutions have started to collect this data for students. With the introduction of the PCDA we will be able to start to build a picture of the socio-economic backgrounds of PCDA candidates.

The Police Constable Degree Apprenticeships provides an entry route for those including poorer applicants for whom other entry routes may not be a viable option. By presenting the opportunity to earn whilst working towards the qualification the PCDA has the potential to attract those from poorer backgrounds who may not be able to afford to pay for a degree.

See Recommendation 7

29 All Party Parliamentary Group on Apprenticeships, Annual Report, 2017
Through the consultation some issues were raised which interface with the new entry routes but are beyond the scope of this Equality Impact Analysis:

A. The PCDA rate of pay is currently under review by the NPCC and a Police Officer Reward Framework is being developed which will set the rate of pay for PCDAs. This EIA will be revised following the publication of the framework.

B. Concerns have also been raised around allowing forces to run existing entry routes like IPLDP, alongside the PCDA, during the transition period. This, respondents feel, would create an inequality of opportunity for potential candidates as the PCDA includes a greater element of study over a longer probationary period.

The College will issue Transition Guidance which will include guidance for forces on managing entry routes through the transition period and preparing for the mandatory date for implementation of the new constable entry routes in January 2020

C. Vetting has been highlighted as an area of concern for BAME applicants who are according to respondents disadvantaged by current processes and procedures. It is known that BAME people are over-represented in the criminal justice system and it was suggested that as a consequence BAME applicants are more likely to fail vetting. This analysis did not include a review of vetting, deemed to be outside of scope, however the new code for police vetting was given the authority of Parliament on Thursday 12 October 2017 to improve consistency across 43 police forces. The College has also created training for vetting staff and published Authorised Professional Practice, outlining the levels of vetting required for different roles.

The EIA will be updated following a review of the code and the associated training and guidance.

D. Respondents also asked about links with other recruitment and selection processes including, SEARCH, Fast Track and Direct Entry. The College has set up an internal working group to look at this issue and provide guidance on a coordinated approach.

E. Apprenticeships in Wales are not funded in the same way as those in England and at present this will mean that Welsh forces would have to fund any PCDA without subsidy via the Levy. The College are in discussions with the Welsh Government and the Home Office to support negotiations for the PCDA to be included on their list of prioritised apprenticeships and will continue to provide updates on any developments.

F. Early feedback on the initial entry routes raises concern for existing officers who may not have a level six qualification and a need for further assurances that existing officers will not be detrimentally impacted on by the PEQF.

The new entry routes are only applicable to new entrants to policing and should not impact on existing officers. Existing officers will continue to be supported through
CPD and the College has also developed a standardised process for the Recognition of Prior Experience and Learning (RPL).  

G. The lack of national data on the police workforce which covers all protected characteristics is a genuine concern of respondents to the consultation and to the College. Through the evaluation of the PEQF the College will start to collect and analyse data on candidates who have come through the three new entry routes and start to build a more comprehensive picture of how the workforce is made up.

The College would also welcome guidance on or links to any official data or research which could inform future updates of the EIA.

Appendix 1: Mitigation Plan
The following mitigation plan will be led by the PEQF Equalities and Regulations Senior Advisor

<table>
<thead>
<tr>
<th>No.</th>
<th>Mitigation/Recommended Activity</th>
<th>Activity and Outcome</th>
<th>Owner</th>
<th>Timescale</th>
<th>Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>It is recommended that the College initiates and works with an EIA Working Group to inform a better understanding of engaging protected groups and ensure that officers from protected groups are fully engaged with the PEQF programme.</td>
<td>E&amp;R Snr. Advisor working with Equality Impact Analysis Group to develop strategy Engagement Strategy</td>
<td>PEQF Equalities and Regulations Senior Advisor</td>
<td>February 2018</td>
<td>An Equality Working Group established February 2018; The group is made up of key stakeholders from across the service and meets every 6 weeks</td>
</tr>
<tr>
<td>2</td>
<td>It is recommended that data gathered be used to monitor and report on initial outcomes for protected groups who join through the three new entry routes. As part of the PEQF evaluation, the College will also track and monitor backgrounds of applicants through the data being collected by Higher Education Institutions</td>
<td>Data collection, analysis and reporting Evaluation report and recommendations</td>
<td>Levin Wheller</td>
<td>Ongoing</td>
<td>An Evaluation Strategy has been drafted and will focus on 4 early adopter forces</td>
</tr>
<tr>
<td>3</td>
<td>It is recommended that the College initiate and work with an EIA Working Group to develop: a framework/toolkit for local Equality Impact Analysis,</td>
<td>Ongoing engagement through EIA working group EIA Framework/templates for forces</td>
<td>PEQF Equalities and Regulations Senior Advisor</td>
<td>August 2017 – April 2018</td>
<td>An Equality Impact Analysis Template has been developed and is available for forces (<a href="#">here</a>) POLKA has not proven successful in engaging colleagues or generating discussion. Working with colleagues to identify</td>
</tr>
<tr>
<td></td>
<td>a POLKA PEQF EIA Community for networking and to share innovation. Also a mechanism for the collection, analysis and dissemination of case studies and examples of good practice</td>
<td>Guidance on engaging diverse communities Online EIA Community</td>
<td>another suitable online platform</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
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<td>4</td>
<td>The Government is working to develop a Sharia compliant loan system for students and it is recommended that the College monitor these developments and keep forces informed of any progress made.</td>
<td>Monitoring of developments and reporting on any changes Published updates</td>
<td>Ongoing No update available</td>
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<td>6</td>
<td>The College of Policing National Programme Specification for the degree in policing will include requirements for force and higher education collaborative providers to ensure all students are provided with a handbook detailing the support available to them, including reasonable adjustments. The provision of such support will also need to be evidenced by degree providers and monitored as part of the quality assurance arrangements for the College approval process.</td>
<td>Quality assurance and monitoring Reports</td>
<td>Ray Clare Ongoing First Quality Standards Board for early adopter force to be held in June 2018</td>
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<td>7</td>
<td>The College will issue guidance on the currency of degrees and relevance of candidate experience with reference to the degree-holder entry route as part of</td>
<td>Development of guidance Transition Guidance</td>
<td>Kevyn Burns January 2018 Completed –<a href="#">available here</a></td>
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<td>8</td>
<td>It is recommended that the College seeks to join the Apprenticeships Champions Diversity Network to champion the PCDA to underrepresented groups</td>
<td>Engagement with network membership</td>
<td>PEQF Equalities and Regulations Senior Advisor</td>
<td>Ongoing</td>
<td>Working with internal College to develop cross-College application</td>
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<td>9</td>
<td>The College is currently working closely with the Education and Skills Funding Agency and their National Apprenticeship Service to develop and deliver initiatives aimed at engaging candidates from BAME backgrounds with the PCDA. The first of these initiatives will be a widening participation in apprenticeships event, planned for March 2018 and future initiatives will be added to the mitigation plan when agreed.</td>
<td>Partnership working Widening participation event</td>
<td>PEQF Equalities and Regulations Senior Advisor</td>
<td>Ongoing</td>
<td>Widening participation through apprenticeships event delivered 5th March 2018</td>
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<td>10</td>
<td>The College recognises that apprenticeship promotional campaigns including National Apprenticeship Week are very focussed on engaging young people. As such the College will continue to work with the Education and Skills Funding Agency to develop specific promotional materials targeting older apprentices and supporting forces in promotion of the PCDA to specific groups.</td>
<td>Partnership working Targeted marketing</td>
<td>PEQF Equalities and Regulations Senior Advisor</td>
<td>Ongoing</td>
<td>It is anticipated that this will be supported by membership of ACDN.</td>
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