Equality impact analysis

Implementation of the new entry routes for police constables

Version 12.0
April 2020
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Introduction

1. The ambition of the National Police Chiefs’ Council (NPCC) and the Association of Police and Crime Commissioners (APCC) is that '[B]y 2025 policing will be a profession with a more representative workforce that will align the right skills, powers and experience to meet challenging requirements'.\(^1\) This ambition is included in the Policing Vision. The Policing Vision presents the policing plan and shapes decisions around workforce development, including how police forces use resources to help keep people safe and provide an effective, accessible and value-for-money service that can meet the challenges of the modern policing landscape.

2. The Policing Vision emphasises the critical reliance of the police service on the quality of its people, and establishes the principle that policing needs ‘to be delivered by a professional workforce equipped with the skills and capabilities necessary for policing in the 21st century’.\(^2\) The new entry routes for police constables were developed in partnership with our stakeholders to meet these objectives. They have been designed to ensure that officers are given the skills and knowledge required to prevent crime, protect the public and secure public trust, both now and in the future.

3. A key component of the Policing Vision is that the police service is representative of the communities it serves. It is essential that we try to understand whether certain initiatives, such as the new Policing Education Qualifications Framework (PEQF) entry routes for police constables, have an impact on workforce demographic and the attraction, recruitment, progression and attrition of those with protected characteristics.\(^3\) That is the purpose of this equality impact analysis (EIA).

4. The police service is working with diligence and passion to promote diversity, equality and inclusion. Forces are engaging with the community and forging connections with groups who had not previously considered policing as a career. We are proud to support forces in their work to secure a fair, inclusive and representative police service.

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\(^2\) Ibid

\(^3\) For more information on the protected characteristics, please refer to paragraph 8.
5. The impact of the new entry routes on the demographic diversity of the police workforce will depend on a number of variables, some of which are not within the College’s control. Forces and higher education institutions (HEIs) will play a significant part in the successful introduction of programmes and their outcomes, such as recruitment, retention and attrition. It is important that each implementing force considers how it will identify, monitor and address any possible disadvantage against a protected group or other inequality issues.

6. The EIA process is designed to ensure that as policies develop and change, they do not have a negative or discriminatory impact on protected groups. When implementing the new entry routes, forces and HEIs are required to develop their own EIAs, evidencing how diversity, equality and inclusion are embedded in their delivery infrastructure. This is a core requirement that must be met as part of the College’s quality assurance process.

7. Many forces are proactive and progressive in the monitoring of workforce data to ensure equality of opportunity. Introducing new entry routes makes a comprehensive understanding of workforce demographic essential. Analysis of workforce data will direct the force to any disproportionality or under-representation. Findings should be included in the force’s EIA. We will ask forces to share data with us so that we can develop a national analysis.

Legislation

8. As imposed by section 149 of the Equality Act 2010 (EqA), the public sector equality duty (PSED) requires public bodies who carry out public functions to have due regard to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
- foster good relations between people who share a relevant protected characteristic and people who do not share it

The PSED applies to all nine protected characteristics listed in the EqA:

- age

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The data will be anonymised and in full compliance with data protection legislation.
• disability
• gender reassignment
• marriage and civil partnership
• pregnancy and maternity
• race
• religion or belief
• sex
• sexual orientation

9. It is also important to consider the impact of intersectionality on equal opportunity. Intersectionality means recognising that people’s identities are shaped by multiple factors (the many personal characteristics that make up an individual). Protected characteristics cannot be treated as discrete identities, as they can quite often overlap when discrimination occurs. An awareness of intersectionality creates a much better understanding of the differences among individuals.

10. Socioeconomic status is also a factor that can be a basis for inequality. It is provided for under Part 1 of the EqA. Through data collection and analysis, forces will be able to ensure that the impact on this characteristic is also taken into account.

11. We are committed to ensuring that the Welsh and English languages are treated equally where applicable, in accordance with the Welsh Language (Wales) Measure 2011. We are exploring the option of introducing a Welsh Language Scheme to support Welsh forces in complying with their statutory duty to provide bilingual services to the public in Wales.

12. Amendments to regulations 10 and 12 of the Police Regulations 2003 came into effect in January 2018, which permitted appointment to a force via the new entry routes. The changes also specified the probationary period of three years for full-time entrants via the Police Constable Degree Apprenticeship (PCDA) route. Further changes to regulation 10 are planned. Any amendments will be developed in consultation with our stakeholders and subject to approval by the Home Secretary. All relevant updates will be included in this EIA.

Data

13. National police workforce data does not cover all nine protected characteristics. Only demographic indicators for age, race and sex are currently available. The College is a
key stakeholder in delivering the NPCC Diversity, Equality & Inclusion Strategy 2018 - 2025. To achieve the NPCC vision of a more representative workforce that aligns the right skills, powers and experience to meet challenging requirements, better consistency in data gathering is required across all protected characteristics. The NPCC has pledged to cultivate a better understanding of the composition of the workforce, by ensuring systems are in place that enable workforce data to be collected, collated and analysed across the nine protected characteristics. This work is expected to be delivered over the next five years. We will continue to work with our stakeholders to develop more comprehensive national workforce data.

14. There is a national issue with reluctance to share protected characteristic information from much of the workforce. We are also working with the NPCC and forces to explore this further. It is essential that this issue is tackled, as data provides us with the tools we need to effectively assess equality impact. Collaborating with our stakeholders, we will work to resolve the issue and improve the rates of information sharing by the police workforce.

15. Securing a high level of programme maintenance and management is key. Implementing forces will be required to complete certain core requirements, to ensure that the new entry routes are governed by PEQF structures. We will request that forces consider the equality considerations of their intended model of delivery and integrate these considerations into all aspects of implementation. Forces are asked to consider the following.

- Equality of opportunity for each stage of the entire learner journey, including outreach and engagement with prospective groups and candidates, recruitment and selection, retention and attrition, progression, and success and destination.
- Each of the nine protected characteristics.
- Other characteristics pertinent to the local population, such as socioeconomic status, deprived neighbourhoods, carers, political affiliation and Welsh language.

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6 Ibid
• Providing information on mechanisms to review, update and monitor the EIA throughout the programme.

• Considering how any existing organisational widening participation strategy has considered this particular programme.

Stakeholder engagement

16. To support the development of the new entry routes, we have received invaluable input from a working group composed of diverse representation from key stakeholders. Diversity considerations have been integrated into product development throughout the design phase. Feedback is also gathered through ongoing engagement with the PEQF Implementation Reference Group (IRG), the Initial Policing Education Board (IPEB) and the PEQF Board. These groups are also made up of a cross-section of representatives from policing and other key stakeholders.

17. Stakeholders receive regular ‘headline emails’ detailing programme updates and implementation concerns. Forces receive ongoing support from our implementation officers and from the College’s diversity and inclusion team. A dedicated knowledge hub 7 has been created for forces to learn more about the EIA process and to share learning with other forces.

18. Forces and HEIs are required to complete their own EIAs as part of the quality assurance process for implementation. Forces are given guidance on potential avenues for further investigation and other research to add to their EIAs. This process creates another opportunity for knowledge exchange and shared learning.

Updating the EIA

19. Diversity, equality and inclusion is woven into the PEQF and is a key priority for us. Updates to this EIA will be published on each key update and at least twice a year. The equality impact will be reviewed on an ongoing basis, in accordance with the EqA direction that the equality duty should be a continuous duty. This document will remain a ‘living document’. We will include key findings from stakeholder meetings, recommendations, action plans and emerging practice to reflect progress made, as well as any new challenges identified.

7 An information-sharing and collaboration platform.
20. This EIA builds on previous versions. In 2016, when the concept of new entry routes was originally proposed, concerns were raised around whether the introduction of the new entry routes – including a self-funded degree route – would advance or hinder equal opportunity. In 2017 and 2018, further updates identified potential impacts on a range of protected groups, including age, disability, race, religion or belief, and sex.\textsuperscript{8} Equal access to opportunity is crucial to engaging all under-represented groups. These concerns have informed the subsequent development of each of the new entry routes.

21. To support future updates of the EIA, we welcome data or further evidence from forces and other key stakeholders. If you have any useful information that may help to develop the EIA, please contact us at PolicingEQF@college.pnn.police.uk

Other considerations

22. The government has pledged to increase police recruitment targets by 20,000 over the next three years through Project Uplift. This is in addition to existing vacancies.

23. COVID-19 has imposed an unprecedented challenge on the police service. It is unknown at this stage how the pandemic will affect forces’ capacity to introduce the new programme or how it will affect police recruitment generally.

\textsuperscript{8} A lack of robust data and other supporting evidence for gender reassignment, marriage or civil partnership, pregnancy and maternity, and sexual orientation did not enable observations to be made about these characteristics.
Background

The new entry routes

24. Modern policing is facing new challenges and the communities served by the police are increasingly diverse and complex, with differing needs and priorities. The nature of crime is also evolving, taking on new forms and presenting different threats to the public. The constable role sits at the heart of effective policing. It is a dynamic and challenging role that requires high levels of professional knowledge and skills, across a range of complex and challenging situations and contexts. Constables need to have a high level of emotional intelligence, strong behavioural interpretation skills and an ability to analyse and resolve rapidly evolving events.

25. The new entry routes were developed with our stakeholders, to provide new recruits with the skills and knowledge necessary for modern policing. The programme offers a breadth and depth of training that acknowledges the complexity of the constable role. The new curriculum is designed to help improve new recruits’ ability to think critically, to reflect and deliberate effectively, to exercise judgement, to challenge accepted norms, to work with a high degree of autonomy, to communicate effectively and to be independent decision makers. These skills and attributes align with vocational level six learning.

26. The new framework is comprised of three new national entry routes into the policing profession in England and Wales.

Police Constable Degree Apprenticeship (PCDA)

27. This entry route is a professional degree-level apprenticeship, enabling new recruits to join the police service as an apprentice police constable. Students will complete a Degree in Professional Policing Practice during their three-year programme. The programme combines the academic study and learning opportunities offered in a university degree with the dynamic and practical experience of an apprenticeship.

Degree-Holder Entry Programme (DHEP)

28. This is an entry route into the police service for degree-holders whose first degree is not in professional policing. It operates as a graduate entry programme or conversion
programme to the profession of policing. Recruits undertake a two-year practice-based level six Graduate Diploma in Professional Policing Practice.

**The pre-join Degree in Professional Policing**

29. This entry route involves completing a knowledge-based Degree in Professional Policing. The pre-join degree can be delivered as either a standard three-year degree programme or a two-year accelerated programme. The degree is achieved prior to recruitment to the police service. It is run by an HEI and the student has no guarantee of recruitment into the police service. Those successful in recruitment to the police service will have acquired, prior to joining, all of the knowledge base relevant to performance of the role. Practice-based operational competence is achieved during the post-join probation period. Forces can choose to work with an education provider to include a practical element during the programme, specifically linked to membership of the Special Constabulary.

30. The Code of Ethics and diversity, equality and human rights considerations are woven into the infrastructure of the curriculum for all three entry routes. The appropriate exercise of police powers and procedures, fairly and without bias, is introduced in initial learning. There is also a curriculum area dedicated to diversity, equality and human rights in professional policing. The curriculum invites the learner to explore key topics, asking them to challenge bias, prejudice, discrimination and stereotyping, and introduces them to professional strategies to address these issues. The course also provides a comprehensive introduction to key pieces of legislation, including the EqA and the Human Rights Act 1998.

**Implementation**

31. Implementation of each of the new entry routes will vary by force and HEI. As such, the current and future versions of the EIA will use data available at the time of publication.⁹

32. As of March 2020, 19 forces had implemented the PCDA, seven forces had implemented the DHEP and 25 HEIs had been licensed to deliver the pre-join degree. Three HEIs have applied to deliver the two-year accelerated degree. We will work

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⁹ Recruitment data from four of the forces currently recruiting new entrants via the PCDA – Derbyshire, Leicestershire, Northamptonshire and Nottinghamshire – has been used in the initial impact assessment portion of the EIA to demonstrate some of the early outputs from this entry route.
with forces and HEIs to obtain demographic data so that we can assess equality impact. Data for the pre-join route will not be available until 2021 at the earliest.

**Evaluation and other related projects**

33. As part of the wider, long-term evaluation of the new entry routes, we are working with a number of early-adopter forces to monitor implementation of the PCDA. Data from interviews with recruits and their line managers, as well as feedback from HEI staff involved in delivering and supporting the programme, will enable us to further share examples of emerging practice. The evaluation will allow us to identify issues and any further mitigating actions that may be required. In addition to looking at the impact on the diversity of recruitment, this will also help us to ascertain some of the motivations for joining and will consider attrition rates in comparison to current programmes. The evaluation report will be published in summer 2020.

34. We have developed a new National Assessment Centre for Police Constables (Day One), which will replace the current SEARCH process. The Day One project is being monitored to identify any potential barriers to recruitment across each of the protected characteristics.
Impact

35. The Policing Vision 2025 states: ‘Policing is built on our people. There is a need to add critical new skills to the service, get the right mix between officers and staff and be more representative of the communities we serve to achieve our vision’. It is imperative that any new workforce development initiative helps policing to reach this objective.

36. The three new entry routes bring many benefits to policing by:
   - supporting educational equality within the policing profession
   - proactively embedding equality, diversity and human rights considerations as a core function of professional practice
   - having the potential to attract a more diverse range of candidates than the current level three entry route, by leading forces towards professional pathways
   - giving potential candidates more choice, which may help widen access to demographically diverse audiences
   - giving due regard to all protected groups and building this into the routes’ development, implementation and delivery

The protected characteristics

37. The College and the police service are committed to meeting the equality duty and ensuring that all protected characteristics are given due consideration. We are firm on the point that there is no hierarchy to the protected characteristics. While this EIA explores all of the protected characteristics, the availability of Home Office national workforce data for age, race and sex has facilitated further exploration of these characteristics. The impact on individuals who identify with the other protected characteristics is mainly unknown at present. This is primarily due to a lack of data or relevant research. We welcome further data and evidence from forces to facilitate further analysis.

38. In addition to the protected characteristics, we are aware that forces are becoming increasingly concerned about the impact that the new entry routes may have on

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different socioeconomic groups. ‘Socioeconomic’ considers how the combination of ‘social’ and ‘economic’ factors, such as class, have the potential to hinder certain groups’ prospects. While it is not a protected characteristic, our duty to pay it due regard is given in the EqA. It is included in this EIA to raise awareness and consideration of possible mitigations.

Initial assessment of potential impact

Age

PCDA

39. **Consideration:** There is a common misconception that apprenticeships are just for young people. This may discourage those from older age groups from applying for the PCDA.

40. **Mitigation:** Data suggests that these misconceptions may be on their way to being remedied as awareness of the value of apprenticeships begins to grow. For employers, apprenticeships serve as a unique opportunity to diversify their existing workforce. For an older candidate, the apprenticeship may facilitate a career change or be a valued opportunity to return to employment.

41. The age profile of apprenticeship starters changed between 2017/18 and 2018/19. In 2018/19, the figure for new starters under the age of 19 decreased and the figure for those aged over 24 increased. In 2018/19, 46% of apprenticeships were started by people aged over 24.\(^1\) It is likely that changes to the way that apprenticeships are funded and the introduction of the Apprenticeship Levy in 2017 have led to an older apprentice demographic. These findings suggest that PCDA should not be marked as a less appealing option to older candidates. Forces are encouraged to continue to monitor the age profile of their new recruits. We will work with forces to monitor this data and consider mitigations if there are any obstacles for this protected characteristic.

42. **Consideration:** The degree apprenticeship market is highly competitive. Like other sectors, forces aspire to use recruitment and selection processes to identify the best talent to meet their needs. Forces have raised concerns that the current minimum age restrictions could mean they lose potential candidates, as other employers may have already made their selections from the recruitment pool.

43. **Mitigation:** We have started work with the Home Office and consultation with other stakeholders to amend regulation 10 of the Police Regulations 2003. The proposed amendment will allow forces to accept applications from those under the age of 18. Any regulatory change will not seek to change the minimum appointment age. However, it will enable forces to accept applications from those at, or near, school leaving age. It will also help to ensure that the PCDA can compete with other career options. There are plans to lay the proposed regulation change before parliament in June 2020 though this scheduling may be affected as a consequence of the COVID-19 pandemic.

44. **Key PSED objective(s) considered**: Advance equality of opportunity.

45. **Consideration:** Salary will be a crucial factor in determining who applies for the PCDA. A lower wage may only be attractive to applicants with fewer financial responsibilities, many of whom are likely to be younger. Conversely, the opportunity to earn while learning and achieve a level six degree qualification could be an attractive option for those with more financial responsibilities, who are likely to be older.

46. **Mitigation:** The Home Secretary has accepted the recommendations of the NPCC to set the PCDA starting salary between £18,000 and pay point 1 (£23,586), followed by annual pay increments. This is to allow individual forces to decide the amount that is appropriate to the force area, based on local financial, workforce and job market considerations. This range is higher than both the national living wage (£15,269 per annum as of April 2019) and the salary offered by a number of other apprenticeship routes. The EIAs we have received as part of the quality assurance process confirm that many forces have given this issue serious consideration and have modified starting salaries accordingly.

Forces can determine how the new entry routes are marketed. The PCDA will be a critical factor in terms of influencing the age range of recruits that join through a particular route. As well as setting a wage that the force considers appropriate, forces

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12 Readers should note that inclusion of one part of the equality duty in this section is intended only to draw specific attention to a particularly relevant part of the duty. Due regard should be given to all parts of the duty. It is worth adding that the College and the police service are committed to a continuing regard of all components of the equality duty.

may wish to orientate their marketing to ensure that a good balance of age groups is catered for.

47. **Key PSED objective(s) considered:** Advance equality of opportunity. Fostering good relations.

**PCDA and pre-join degree**

48. **Consideration:** The College could not identify a source confirming the highest level of educational attainment by age group.\(^{14}\) Some forces have expressed concern that older applicants may be less likely to hold a level three qualification – a potential HEI entry requirement – and are therefore excluded from applying. The College invites any evidence or associated research that can support our own research in this area.

49. **Mitigation:** There is no evidence to indicate that older applicants may be less likely to hold a level three qualification. However, recruitment figures – or anecdotal evidence given as feedback from potential applicants – may necessitate mitigating action.

50. The EIAs we have received from forces as part of the quality assurance process confirm that for many collaborations, forces are working with their partner HEIs to develop a framework of equivalence, whereby other qualifications or work experience contribute to entry requirements. This mechanism for recognition of prior learning encourages participation by those with ‘non-traditional’ academic and professional backgrounds.

51. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Pre-join (standard)**

52. **Consideration:** Those with financial commitments may not be able to afford to study for a degree and may not see the pre-join degree as a viable option. This may be true for many older candidates.

53. **Mitigation:** Prospective students may be able to access student loans and maintenance grants via the Student Loans Company. HEIs use a range of initiatives to engage older students. As part of our annual quality assurance review process of licensees, we will identify and share examples of emerging practice. The HEI may

also offer bursary or scholarship schemes. Each HEI has student support teams who can offer advice and financial guidance.

**Key PSED objective(s) considered:** Advance equality of opportunity.

**Pre-join (accelerated)**

54. **Consideration:** For potential candidates with financial commitments who are concerned about the costs associated with higher education, the two-year accelerated programme may be particularly appealing. The shorter course duration has the potential to be cheaper with lower overall fees, lower associated costs (for example, travel to campus) and a shorter timeframe for living expenses to accrue. The programme also allows the student to move into employment more quickly. This will rest on a number of different variables, for example, if accommodation arrangements are a shared or sole financial responsibility, or whether the student has children.\(^{15}\)

55. **Consideration:** Research indicates that accelerated programmes are appealing to older age groups.\(^{16}\) Many of the institutions that piloted accelerated programmes recognised at the outset that offering more flexible learning provision would widen participation.\(^{17}\) In 2016/17, the proportion of mature students studying for accelerated degrees was 20% higher than the proportion on non-accelerated pathways.\(^{18}\)

56. **Consideration:** There are social dimensions to learning, which are sometimes referred to as ‘consumption benefits’.\(^{19}\) These social dimensions may be of particular significance to those in younger age groups, for whom going to university is often their first experience of living away from home. Without their usual social networks, making new social connections will be instrumental to a positive university experience. However, the issue is relevant to all age groups and will depend on whether the

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\(^{15}\) See paragraph 66, where this issue is explored further.


\(^{17}\) Ibid


ature_Review.pdf [Accessed March 2020]
student, whatever their age, sees the social dimension of university life as a key motivator or significant part of attending university.

57. The accelerated degree may reduce access to the social benefits of the university experience. The nature of the programme’s delivery may mean there is less time for the student to interact with others. The teaching structure means that they may have to attend university at different times to their peers. Intensity of learning may mean that they are unable to engage in wider activities. An accelerated degree may therefore have a negative impact on students – particularly those from younger age groups – whose perception is that the social experience of university is as important as the academic experience.

58. **Mitigation:** Many HEIs are offering personal tutor support to their students. This connection will ensure that the student is happy and progressing successfully, and will provide an opportunity for the student to raise any concerns. All HEIs have student support teams who can provide support and guidance. HEIs may want to monitor how often accelerated degree students are engaging with the social aspects of university life and, if engagement is low, create opportunities to allow for more participation. HEIs may also wish to ensure that the process of transitioning to the three-year programme is possible. It is also pertinent to note that this may not be an issue for many students. Each person will come to university with their own motivations and social preferences. Having fewer opportunities to experience the social dimensions of university may not be a loss to some.

59. HEIs may wish to ensure that delivery scheduling provides time for students to pursue part-time employment options. This will support all students of all ages but perhaps has particular relevance to older learners with pre-existing financial commitments, or those who have always been in employment and do not wish to stop working.

60. HEIs are encouraged to monitor student age profiles. Comparative analysis between accelerated and standard courses may provide useful insights and may allow the HEI to ensure that there are no obstacles preventing access to any age group.

**Pre-join degree and DHEP**

61. **Consideration:** Undergraduate study is very popular to those aged under 20. This is likely to be reflected in the pre-join degree’s recruitment age demographic. It is worth noting that the second highest age category for first degree enrolments is 30 years and over. This age category also features the highest increase between 2017/18 and
2018/19, suggesting that higher education is becoming increasingly accessible to older age groups.

62.

<table>
<thead>
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<th>Age group</th>
<th>2017/18</th>
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<tr>
<td>20 and under</td>
<td>12,210</td>
<td>12,690</td>
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<tr>
<td>21–24 years</td>
<td>8,825</td>
<td>9,205</td>
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<tr>
<td>25–29 years</td>
<td>3,650</td>
<td>4,250</td>
</tr>
<tr>
<td>30 years and over</td>
<td>10,400</td>
<td>11,235</td>
</tr>
<tr>
<td>Age unknown</td>
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63. **Mitigation:** Forces will be encouraged to monitor recruitment age. If recruitment figures indicate a disproportionately low number of entrants from a particular age group, mitigations can be considered to identify potential barriers and obtain balance. These mitigations could include further research into possible causes, as well as targeted marketing and outreach.

As higher education enrolment figures indicate that there may be a higher proportion of younger entrants, forces may wish to integrate this into their marketing and support approaches. Further consideration may be given towards some of the obstacles that may arise for applications received from candidates aged 25 or over, some of which are reviewed below, and innovative solutions may be implemented.

Although first degrees may be more popular with younger students, the DHEP entry route recognises the skills that degree holders can bring to policing. This is likely to attract a range of ages, from recent graduates to those already in the workplace who are looking to embark on a new career.

64. **Key PSED objective(s) considered:** Advance equality of opportunity.

**All three routes**

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20 First degrees are degrees that lead to a bachelor's degree qualification, such as BA or BSc.

65. **Consideration:** Individuals who have caring and/or familial responsibilities, many of whom will be aged 25 and above,\(^\text{22}\) may view entering the police service and undertaking additional study as too great a challenge on their time and care commitments.

66. The challenges for those with caring responsibilities on the accelerated pre-join degree will differ to those pursuing the three-year programme. This will depend on the nature of the delivery of the accelerated course, for example, whether learning will be condensed into a standard-length academic year or whether delivery timeframes will be extended to accommodate the learning volume. If the latter option requires teaching delivery during school vacation times, the student may have to find and fund alternative care arrangements. They may find that any financial benefit obtained via a shorter degree programme is negated by increased spending on care arrangements. If teaching delivery is to be condensed, the learning intensity may deter some potential candidates with care responsibilities, who may fear that it would not be possible to balance these with the demands of the programme.

67. **Mitigation:** Some individuals may require additional support and flexible learning options to ensure they can access learning opportunities. Many HEIs have support in place for such students. Forces are encouraged to seek relevant information with HEIs and to establish an understanding of their experience of supporting the student journey for those aged over 25.

68. For the pre-join routes, some HEIs offer on-site childcare facilities. HEIs may wish to connect with those with caring responsibilities to discuss support options. It is probable that institutions offering the two-year programme will also offer the three-year programme. HEIs may therefore wish to consider creating a mechanism of allowing students to move from the two-year to three-year programme if necessary, to support those who would prefer to transfer. If this is possible, the HEI may wish to ensure that the student is given the guidance required to understand the financial implications of any transition.

69. The force may wish to consider whether flexible working or part-time roles are an available option for candidates. Forces are encouraged to consider research indicating that 97% of parents and carers acknowledge publication of policy documents on flexible working, family-related leave and pay policies as being helpful.

\(^{22}\) This is the age at which entry percentages drop, according to the table in paragraph 62.
The same survey confirms that this increased transparency would make an employer attractive to work for.23

70. If the force has a parents network, individuals could be offered guidance and advice from fellow officers and staff via this network.

71. **Key PSED objective(s) considered:** Advance equality of opportunity. Foster good relations.

72. **Consideration:** There is a wealth of research exploring the motivators for an individual’s return to education after an extended period away and the inter-relationship with application, retention and success. Some potential candidates may believe that they are unable to meet the rigours of a level six programme. The role of confidence in lifelong learning is crucial and an absence in self-belief may inhibit many who would make very capable officers from applying via one of the new entry routes. Even if an individual has started their PEQF journey, a continued feeling of inferiority and insecurity may limit their progress.

73. These concerns may deter older learners from considering the accelerated degree. Research indicates that there is limited awareness of the accelerated degree and that there is a strong cultural norm of first degrees taking at least three years to complete.24 There is a misconception that the accelerated degree entails cramming and a sub-standard higher education experience. Very few potential students are not aware of the flexibility in pace or blended modes of learning offered by many institutions.25

74. **Mitigation:** Many HEIs have extensive experience in inclusive practices for more mature learners. These can include mentoring, peer support, drop-in sessions and support networks. Forces are encouraged to find out more about these, as well as the level of awareness held by the HEI of the very unique challenges experienced by mature learners.

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25 Ibid
75. To help make the accelerated degree accessible to all age groups, HEIs may benefit from ensuring that the programme is well marketed, with guidance given to students of the many benefits of an accelerated pathway.

76. Forces may wish to consider liaising with their HEIs to see if advance release of reading lists might be possible. Learners can then place themselves in a position of advantage, allowing them to commence their formal tuition with greater confidence. Many programmes also have integrated study skills modules built into the first year’s course provision. Such modules, or special workshops, could be made accessible to recruits. At the very least, the majority of HEIs will have reading lists of study skills books, some of which are aimed specifically at mature students, which could be given to the recruit in advance so that they feel better prepared.

77. The force may wish to consider embedding positive dialogues in supervision and improving team support mechanisms, for example, via positive feedback, building familiarity and providing support, encouragement and assurance. This support should be ongoing throughout the individual’s learning journey.

78. **Key PSED objective(s) considered:** Advance equality of opportunity. Foster good relations.

**Disability**

All three routes

79. There are certain disabilities that preclude someone from becoming a police constable. These are mostly linked to the physical and/or mental requirements of operational policing, and have not changed with the introduction of the new entry routes.

80. **Consideration:** Concern has been raised about the potential impacts on the progression and attainment of candidates with neurodiverse conditions. This includes whether the requirements of learning and training at level six could prove particularly challenging for these candidates. The table below gives estimates of the prevalence of some neurodiverse conditions in the general population.

81.
### Condition

<table>
<thead>
<tr>
<th>Condition</th>
<th>Estimated prevalence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autism</td>
<td>1.1% of the general population&lt;sup&gt;26&lt;/sup&gt;</td>
</tr>
<tr>
<td>ADHD</td>
<td>5% of the adult population&lt;sup&gt;27&lt;/sup&gt;</td>
</tr>
<tr>
<td>Dyslexia</td>
<td>10% of the general population&lt;sup&gt;28&lt;/sup&gt;</td>
</tr>
<tr>
<td>Dyspraxia</td>
<td>10% of the general population, with 2% severely affected&lt;sup&gt;29&lt;/sup&gt;</td>
</tr>
</tbody>
</table>

---

82. Figures indicate that an increasing number of people with a disability are participating in higher education, with year-on-year increases in first degree enrolments since 2015.

83.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total of first degree enrolments by those who share a disability&lt;sup&gt;30&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015/16</td>
<td>3,630</td>
</tr>
<tr>
<td>2016/17</td>
<td>4,325</td>
</tr>
<tr>
<td>2017/18</td>
<td>5,000</td>
</tr>
<tr>
<td>2018/19</td>
<td>5,375</td>
</tr>
</tbody>
</table>

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A total of 11.2% of apprenticeship starters in 2017/18 had a learning difficulty or disability. This increased to 11.8% in 2018/19.\footnote{Foley N. (2020). ‘Apprenticeship statistics’ [internet]. House of Commons Library Briefing Note, Number 6113. Available from researchbriefings.files.parliament.uk/documents/SN06113/SN06113.pdf [Accessed April 2020]}

Mitigation: Forces and HEIs are required to evidence how they will support people with a disability through the appropriate use of reasonable adjustments. They will be encouraged to review their reasonable adjustment policies to ensure that they are fit for purpose. Forces and HEIs should be aware that the reasonable adjustment duty is an anticipatory duty, and that these considerations should be integrated into pedagogy and other learning infrastructure. This includes initiatives such as ensuring that document drafting conforms to style guides for neurodiversity and providing assistive software for coursework completion.

HEIs have dedicated disability support teams, as well as a range of accessible resources and widening participation programmes. Support mechanisms can include tailored inductions, one-to-one guidance appointments with a disability advisor and assistance with Disabled Students’ Allowance (DSA) applications. Working in partnership with HEIs to deliver the PCDA and DHEP may give forces access to a broader range of support for new recruits than is currently available to them. Forces should ask for evidence from their partner HEI of their commitment to ensuring equality of access for people with a disability.

The force may wish to encourage relevant staff associations to support new recruits in navigating their policing careers as an officer with a disability. Staff may be upskilled by disability awareness training and by starting honest conversations about disability and inclusion. The force may also wish to direct recruits with a disability to third-party professional development hubs.

Current rates of declaration from officers with learning difference or disability are low, and consequently there are no viable national workforce statistics. We understand the importance of robust workforce data collection to facilitate effective equality impact analysis. We are currently working with the NPCC on how to increase declaration rates across all protected characteristics. Combined with the dedicated assessments and resources available from HEIs, this should help to support the early identification of individuals experiencing difficulties.

Key PSED objective(s) considered: Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.
90. **Consideration:** Research from Mind indicates that as high as 91% of police officers have experienced stress and poor mental health at work.\(^{32}\) The College does not have access to further analysis that provide correlations with age, sex and other protected characteristics. Other research provides evidence of increasing levels of reported mental health issues for students in higher education.\(^{33}\) This may deter those whose mental health condition is a disability from applying.

91. **Mitigation:** Forces should assess their HEI’s approaches to mental health support. Many HEIs will offer mental health support facilities, such as counselling, and may have specific policies on student care and mental health. Forces may wish to revisit their staff mental health approaches and ensure engagement with national police wellbeing services, such as Oscar Kilo. A robust approach that integrates disability confidence and mental health awareness into organisational development and pastoral support will help to present policing and the new pathways as an appealing career option.

92. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Pre-join (accelerated)**

93. **Consideration:** Concerns regarding level six training being particularly challenging to those with a disability could be exacerbated by the nature of accelerated learning. Some people with a disability may not consider an accelerated degree a viable option for them because of their disability. Learning intensity may be an obstacle to those with learning difference, as many students would benefit greatly from having the time to consolidate learning. Teaching delivery via long teaching sessions may be an obstacle to students with ADHD, who may struggle to focus and maintain concentration for extended periods of time.

94. **Mitigation:** These are valid concerns and we will encourage HEIs to monitor student recruitment, progress and other demographic data to identify any potential obstacles for people with a disability. However, existing data suggests that these issues may not be shared by the student body. The proportion of students with a disability who were

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studying for accelerated degrees in 2016/17 was 12%. This is only 1% lower than the proportion of students with a disability who were studying standard degrees.  

95. All HEIs have a statutory obligation to provide reasonable adjustments for disabled people. It will be our expectation that HEIs integrate the interests of disabled students into pedagogy, curriculum and all other aspects of delivery.

96. **Key PSED objective(s) considered:** Advance equality of opportunity.

97. **Consideration:** DSA is an annual allowance and is unaffected by the duration of the taught academic year. The maximum amount of support from the on-medical helper component of the DSA is not scaled to the length of the academic year, so standard and accelerated students access the same maximum spend. Students on accelerated programmes that are taught over an extended academic year will have to ensure they can access support for all taught weeks. While there is some provision for course intensity, this is in connection with part-time learning only.

98. **Mitigation:** All HEIs will have student support facilities and many have teams whose specific function is to support students with a disability. Guidance and advice on applying for the DSA and its use will be given. Many HEIs will meet with the student at the start of term to discuss specific learning needs, put reasonable adjustments in place and draft a learning support plan. Any HEI wishing to introduce an accelerated degree is encouraged to meet with student support teams to ensure that mechanisms are in place to help accelerated degree students with a disability.

99. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Gender reassignment**

**PCDA**

100. **Consideration:** Forces have shared their concerns around the three-year probationary period for those on the PCDA being a deterring factor for a candidate considering or undergoing gender reassignment.

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36 Ibid

101. **Mitigation:** As part of the quality assurance process, forces and HEIs must evidence that they have policies or procedures in place to support or mitigate any negative impacts on this protected characteristic. Publishing key points from relevant policies may provide reassurance to potential candidates of a force’s commitment to trans inclusion.

102. **Key PSED objective(s) considered:** Advance equality of opportunity.

**All three routes**

103. **Consideration:** There is currently very little data from which we can draw equality impact analysis for this protected characteristic. We are aware that many forces have gender reassignment policies and processes in place to support those who wish to transition. Many forces have had experience of supporting officers undergoing gender reassignment. All forces are aware of the NPCC guidance on gender reassignment and several forces feature on the Stonewall UK Workplace Equality Index.

104. Forces should adapt training delivery timeframes to accommodate extended periods of absence that may be needed for gender reassignment purposes.

105. Research indicates that half of trans and non-binary people have hidden the fact that they are LGBT at work for fear of discrimination.\(^\text{38}\) We understand that there is more that can be done to support people who share this protected characteristic, and that more research is required to build an evidence base.

106. We will work with forces to monitor the data closely and consider mitigations if there are any obstacles for this protected characteristic.

107. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

**Marriage and civil partnership**

**All three entry routes**

108. The impact of the new entry routes on those who are married or in a civil partnership is unclear at present. We welcome any information or data on this.

109. **Mitigation:** If there is a disproportionate number of recruits from younger age groups, there may also be a reduction in the number of recruits who are married or in civil

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partnerships. Office for National Statistics data indicates that the average age of men in opposite-sex relationships marrying is 37.9 years and the average of women is 35.5 years. For same-sex relationships, the average age is 40.8 years for men and 37.4 years for women.\textsuperscript{39}

\textbf{Mitigation:} We will work with forces to monitor the data closely and consider mitigations if there are any obstacles for this protected characteristic.

\textbf{Key PSED objective(s) considered:} Advance equality of opportunity.

\textbf{Pregnancy and maternity}

\textbf{PCDA and DHEP}

110. \textbf{Consideration:} Forces have indicated to us that the PCDA’s three-year probationary period may deter those who become, or plan to become, pregnant.

\textbf{Mitigation:} As they are fully sworn officers from day one, recruits are covered by Regulation 33 of the Police Regulations 2003, which outlines the conditions under which officers are granted leave. This includes maternity, parental and adoption leave. Similar support would be available to those who join through the DHEP route.

Forces may wish to provide additional support via staff networks.

\textbf{Key PSED objective(s) considered:} Advance equality of opportunity.

\textbf{Pre-join (accelerated)}

111. \textbf{Consideration:} Parents in receipt of Parents’ Learning Allowance may be affected because it is an annual allowance that is unaffected by teaching duration. If the accelerated programme is taught over an extended academic year, there will be no proportional increase to the allowance. There is some recourse for additional funding if the student is under 25 and supports themselves, pays for childcare, has an adult who is financially dependent on them, or has a disability or learning difference.\textsuperscript{40}

112. \textbf{Mitigation:} HEI student support teams may wish to connect with those who are affected by this issue. There may be options open to the student via HEI grants or


\textsuperscript{40} UK Government. (nd). ‘Parents’ learning allowance’ [internet]. Available from gov.uk/parents-learning-allowance [Accessed March 2020]
bursaries. The HEI may have on-site childcare facilities with subsidised rates. Student support services can provide financial guidance to students if required.

Race

113. In 2019, 6.9% of police officers identified as being Black and minority ethnic (BAME), a small increase from the 6.6% recorded in the previous year. The percentage of new BAME joiners increased by 1%, to 11%. While BAME representation across the service is growing, the 14% BAME population of England and Wales confirms that under-representation is still an issue. The police service understands that this is not a time to be complacent. Diversity and inclusion and positive action teams in forces are working hard to promote the police service as an employer of choice for all protected groups. Forces should have a clear zero-tolerance approach to bullying or other discriminatory behaviours. Senior leaders should be diversity champions and should mobilise their workforce to support equality and inclusion.

PCDA

114. Consideration: The proportion of apprenticeship starters from BAME backgrounds increased from 11.2% in 2017/18 to 12.3% in 2018/19. The percentage represents an increase of 6,000 apprentices. At a total of 48,390, this is the highest level of BAME apprentices on record.

115.

### Apprenticeship starters in England in 2018/19 by learner ethnicity

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41 ‘BAME’ in this instance follows the Home Office counting rules and does not include White minorities. As per Home Office rules, White minority groups fall under the ‘White’ subset. However, many of the concerns included in this assessment may impact all minority groups.


43 As per the 2011 census. The 2021 census is likely to confirm a rise to this figure.


46 Ibid
<table>
<thead>
<tr>
<th>Ethnic Group</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian/Asian British</td>
<td>21,370</td>
</tr>
<tr>
<td>Black/African/Caribbean/Black British</td>
<td>13,510</td>
</tr>
<tr>
<td>Mixed/Multiple ethnic group</td>
<td>10,520</td>
</tr>
<tr>
<td>White</td>
<td>338,330</td>
</tr>
<tr>
<td>Other ethnic group</td>
<td>2,990</td>
</tr>
<tr>
<td>Not known or not provided</td>
<td>6,660</td>
</tr>
</tbody>
</table>

116. While we know that 13,400 of all apprenticeship starters in 2018/19 were starting degree apprenticeships, unfortunately there is no data to indicate the popularity of level six apprenticeships for particular ethnic groups.

117. The interest in apprenticeships is reflected in PCDA recruitment in 2018. In one instance, 22.4% of applicants were BAME, while in another the figure was 14.8%. While this is encouraging, it should be noted that both forces targeted potential candidates from BAME backgrounds in their recruitment campaigns. The government have made a commitment to increasing the proportion of apprentices from BAME backgrounds by 20%.  

118. Mitigation: It is effective practice for forces to understand their local demographic and seek to recruit a workforce that is representative of that demographic. This is now common practice for many forces. Forces will be encouraged to collect and analyse data relating to the demographic of their workforce. This data will help to inform an understanding of participation, identify limitations and support equality. Forces are encouraged to foster an inclusive environment that is conducive to candid and confident declaration.

119. Forces may wish to make the apprenticeship more appealing to ethnic minority groups via targeted marketing initiatives and by offering specific support opportunities, such as mentoring and encouraging connections with staff and student associations. Forces may also wish to seek connections and work collaboratively with organisations

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that support businesses whose function is to promote apprenticeships for ethnic minorities.

120. The government has committed to increasing the numbers of BAME apprentices and has established the **Apprenticeship Diversity Champions Network** (ADCN). The ADCN champions apprenticeships and diversity, and encourages more people from under-represented groups to consider apprenticeships. Forces could benefit from the collaboration opportunities and resources developed by the ADCN and may wish to connect with the network.

121. **Key PSED objective(s) considered:** Advance equality of opportunity. Foster good relations.

**Pre-join degree (standard and accelerated)**

122. **Consideration:** Evidence indicates that race can affect degree outcomes. The attainment gap between the likelihood of White and BAME students obtaining a first or 2:1 degree outcome is 13%. Other research gives the proportion of White students who achieved a first or 2:1 degree in 2016/17 was 80%. The proportion for Black students was 56%. There are a number of factors that contribute to the attainment gap, including institutional culture and ethnic diversity among role models. Forces are encouraged to ensure that those from a BAME background have as much opportunity to succeed as their White peers.

123. **Mitigation:** Forces are encouraged to establish if their partner HEI monitors attainment gaps. If so, enquiries should be made about what mitigating actions are being taken. Some HEIs will be more proactive in this area than others. Once an agreement is in place, the force should collaborate with the HEI to ensure that the pedagogy and other factors pertaining to curriculum provision, such as the assessment method, are inclusive and limit the possibility of an attainment gap. The government introduced new measures in February 2019 to reduce racial inequality in

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51 Ibid
Higher education.\textsuperscript{52} It is too early to determine if these measures have achieved positive outcomes as yet but, crucially, this holds HEIs accountable for any inequality.

124. Forces should also look to strengthen their own equality and inclusion practices. Honest reflections ought to be taken at all levels, including by senior management, of the potential for bias and discrimination in decision making. Robust and committed approaches by senior leaders to obtaining an inclusive work environment can help to secure equality of opportunity for the entire workforce.

**Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

125. **Consideration:** HEIs continue to make great strides in attracting ethnic minority students. Many use targeted approaches to raise awareness in ethnic minority communities, especially for those where higher education is not the norm. The higher education sector has seen year-on-year increases in participation by those from ethnic minority groups.

126.

<table>
<thead>
<tr>
<th></th>
<th>2016/17</th>
<th>2017/18</th>
<th>2018/19</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian</td>
<td>2,360</td>
<td>2,690</td>
<td>3,005</td>
</tr>
<tr>
<td>Black</td>
<td>7,900</td>
<td>7,735</td>
<td>7,605</td>
</tr>
<tr>
<td>Mixed</td>
<td>1,310</td>
<td>1,445</td>
<td>1,595</td>
</tr>
<tr>
<td>Other</td>
<td>835</td>
<td>885</td>
<td>870</td>
</tr>
<tr>
<td>White</td>
<td>13,860</td>
<td>15,925</td>
<td>17,780</td>
</tr>
<tr>
<td>Not known</td>
<td>645</td>
<td>680</td>
<td>640</td>
</tr>
</tbody>
</table>

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\textsuperscript{52} Ibid

127. The growing proportion of ethnic minority students evidences an appetite for degree-level education from these communities, and suggests that the new entry routes could attract greater ethnic diversity.

128. Although some HEIs have offered policing-related degrees for a number of years, there is no national data available on these. Although the Higher Education Statistics Agency provides student data in relation to gender, age, disability status and ethnicity, it is only at UK level and for 19 broad subject areas, such as social studies and law, not at individual programme level, for example, criminology or policing. This data is also rarely available at programme level for individual institutions. As such, the ability to establish the diversity of current or past students undertaking policing-related degrees is difficult.

129. **Mitigation:** We will continue to work with HEIs to secure access to data regarding the demographic of their student body, so that we can fully assess equality impact. This data should be programme-specific whenever possible.

**Key PSED objective(s) considered:** Advance equality of opportunity.

130. **Consideration:** A recent Equality and Human Rights Commission (EHRC) inquiry confirms that marginalisation and exclusion is still a significant issue in the higher education sector.\(^{54}\) Their report confirms that 24% of students from an ethnic minority background had experienced racial harassment since starting their course. This harassment has caused feelings of isolation and loss of confidence, and has affected mental health and wellbeing. This could understandably deter people from ethnic minority groups from applying.

131. The prospect of harassment has also deterred students from engaging fully with core activities in an attempt to keep themselves from further harm. This subsequently impacts their performance and outcomes. The EHRC report reveals that around 1 in 20 ethnic minority students have left their studies due to racial harassment.

132. **Mitigation:** HEIs are encouraged to be mindful of these observations and monitor student retention accordingly. All HEIs should have clear, zero-tolerance approaches to bullying, harassment and other similar behaviours.

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133. HEIs should have equality and inclusion policies in place, including formal complaints handling procedures. Tackling prejudice and promoting inclusion should be a key priority. Best practice is included in the ‘Recommendations’ section of the EHRC report.

134. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity. Foster good relations.

**Pre-join (accelerated)**

135. **Consideration:** Many of the institutions piloting the accelerated programmes recognised at the outset that offering more flexible learning provision would widen participation.\(^5\)\(^5\) We could not access recent data to indicate the demographic of students on accelerated programmes but would welcome any additional information. Figures from 2016/17 indicate the following:

<table>
<thead>
<tr>
<th>Proportion of students at HEIs and alternative providers in 2016/17 (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian</td>
</tr>
<tr>
<td>Black</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>White</td>
</tr>
</tbody>
</table>

136. **Consideration:** Research indicates that minority ethnic groups have higher rates of poverty than the average population.\(^5\)\(^6\) People from lower socioeconomic backgrounds are often more debt-averse.\(^5\)\(^7\) Those concerned with the expense of higher education may find the two-year accelerated programme appealing. The shorter course duration has the potential to be cheaper with lower overall fees, lower

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associated costs (for example, travel to campus) and a shorter timeframe for living expenses to accrue. It also allows the student to graduate and enter the workplace more quickly.

138. Research has shown that the contribution of accelerated degrees to increasing ethnic diversity is not straightforward. Any contribution is more likely to be indirect due to the degrees’ appeal to older students, who are more likely to display ‘widening participation characteristics’.  

139. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Advance equality of opportunity.

**All three routes**

140. **Consideration:** Localised market research commissioned by the Metropolitan Police Service (MPS) in 2018 showed that the percentage of BAME respondents who would consider a career in policing after reviewing details on the PCDA and DHEP entry routes increased by between 22% to 27%. This suggests that the offer of professional entry routes into policing, and particularly the opportunity to earn while learning, could prove more appealing to BAME groups than a level three entry route.

141. This early evidence highlights the importance of raising awareness and targeting engagement with ethnic minority communities. We will support forces by facilitating the sharing of emerging practices via the National Police Jobs and Opportunities Virtual Platform. The platform provides both internal (force-to-force) and external (force-to-candidate) information sharing areas.

142. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Religion or belief**

**PCDA**

143. **Consideration:** Student loans are not currently compliant with Sharia law. The government has been seeking to develop a compliant loan system, but this has not yet been done. While there are banks that offer compliant loans, the absence of a government student loan offering leads to the possibility that PCDA may be an

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appealing option for Muslim people, as it provides an opportunity to obtain a degree qualification without the need to take a loan.

144. **Key PSED objective(s) considered**: Advance equality of opportunity.

Pre-join degree (standard and accelerated)

145. **Consideration**: Student loans are not currently compliant with Sharia law. This could impact Muslim candidate access to the pre-join degree.

**Mitigation**: This is not unique to the policing pre-join degree. As above, the government has been seeking to develop a compliant loan system, but this has not yet been completed. We will continue to monitor the situation. HEIs may wish to provide guidance to prospective students of the different finance options available, including providers of Sharia-compliant loans.

**Key PSED objective(s) considered**: Advance equality of opportunity.

All three routes

146. **Consideration**: Applicants who adhere closely to religious rites may fear that the demands of police duties may affect their ability to conduct religious observance.

147. **Mitigation**: To promote inclusion, forces can issue guidance on important points from relevant policies, such as prayer times and pilgrimage. Positive messages about the force’s awareness and ability to accommodate individuals from all religions can be integrated into key marketing messages and reasserted at outreach events. Reassurances could be made to leaders of local faith groups, who could further disseminate positive messaging.

**Key PSED objective(s) considered**: Advance equality of opportunity.

148. **Consideration**: Applicants may fear that the police service is not an employer that values difference and that they will struggle to feel included.

149. **Mitigation**: Positive messages could be asserted via marketing, and connections made with local faith groups may influence attraction. Potential applicants should be made aware of the staff association culture within the service and the availability of support networks. Many forces have in-house chaplains, prayer rooms and staff associations for specific religious and non-belief groups. HEIs have similar facilities and forums for students from varying backgrounds.

150. Forces may wish to review staff training to eliminate any possibility of discriminatory practice, reaffirm zero tolerance approaches to bullying or prejudice, foster an
environment where ‘calling out’ negative behaviours earns respect and encourage the workforce, at all ranks and levels, to help build a truly inclusive work environment.

151. Engagement with staff associations have suggested some useful approaches taken by forces and learning providers. Suggestions include:

- providing prayer room(s)
- recognition and celebration of religious festivals (this should also be considered when setting timetables and shift patterns)
- approving articles of faith as part of uniforms
- providing different learning opportunities to reflect religious diversity (for example, inputs from religious speakers on community cohesion)
- engagement with local religious and non-belief groups and staff associations

152. **Key PSED objective(s) considered:** Eliminate prohibited behaviours. Foster good relations.

153. **Consideration:** Religion is not currently collected in the annual Home Office workforce data collection.

154. **Mitigation:** We will encourage forces to collect and monitor data in respect of this protected characteristic, to establish an understanding of participation and potential disadvantage or inequality. We recognise the importance of robust workforce data collection for forces’ ability to assess equality impact. We are working with the NPCC and other partners on how we can promote information sharing in the workforce.

155. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Sex**

**All three routes**

156. **Consideration:** Each year, an increasing number of women are joining policing. The highest proportion of female officers was recorded in 2019 at 30.4%. A total of 35% of all joiners in 2018/19 were female. The national demographic average is 51%.

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157. | Year | Proportion of female officers (%) |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>29.1</td>
</tr>
<tr>
<td>2018</td>
<td>29.8</td>
</tr>
<tr>
<td>2019</td>
<td>30.4</td>
</tr>
</tbody>
</table>

158. There are more females enrolled onto first degrees than males.

<table>
<thead>
<tr>
<th>First degree enrolments by sex&lt;sup&gt;61&lt;/sup&gt;</th>
<th>2016/17</th>
<th>2017/18</th>
<th>2018/19</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>16,195</td>
<td>17,685</td>
<td>19,470</td>
</tr>
<tr>
<td>Male</td>
<td>16,460</td>
<td>17,360</td>
<td>17,845</td>
</tr>
<tr>
<td>Other</td>
<td>35</td>
<td>45</td>
<td>65</td>
</tr>
</tbody>
</table>

159. The over-representation of females does not extend to accelerated degrees. In 2016/17, there were 14% more females on standard delivery degrees than there were on accelerated degrees. This may be linked to the gender differences in risk and debt aversion<sup>62</sup>.

160. The same trend is true for apprenticeships. In 2018/19, there were slightly more females starting an apprenticeship (50.1% compared with 49.9%). With the exception of 2017/18, the figure for female apprenticeship starters has exceeded those for males since 2010.<sup>63</sup>

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161. These findings are also paralleled in the recruitment figures from two of the PCDA early-adopter forces.

162.

<table>
<thead>
<tr>
<th>Force</th>
<th>Male</th>
<th>Female</th>
</tr>
</thead>
<tbody>
<tr>
<td>Force 1</td>
<td>48.1%</td>
<td>51.9%</td>
</tr>
<tr>
<td>Force 2</td>
<td>56.3%</td>
<td>43.7%</td>
</tr>
</tbody>
</table>

163. **Consideration:** The higher probability of women having caring responsibilities may impact on recruitment, retention and progression. While caring responsibility is an issue relevant to both sexes, women aged between 45 and 54 are more than twice as likely as other carers to have reduced working hours due to caring responsibilities.\(^6^4\) The number of lone-mother families far exceeds the number of lone-father families.\(^6^5\) There is a potential intersection with race, as the highest percentage of lone-parent families of all ethnic groups were Black households, at 18.9%. The lowest percentage was found among Asian households, at 5.7%.\(^6^6\)

164. Those with care responsibilities may not see the accelerated degree as a possible option. HEIs will determine delivery method. They may choose to condense learning into a standard-length academic year, increasing the number of contact hours per week. Alternatively, they may extend delivery timeframes by teaching in weeks that are ordinarily vacation times. If the latter option requires teaching delivery during school vacation times, the student may have to find or fund alternative care arrangements. They may find that any financial benefit obtained via a shorter degree is negated by increased spending on care arrangements. If teaching delivery is to be condensed, the learning intensity may deter those who fear that it would not be possible to balance the demands of the degree with care responsibilities.

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165. **Mitigation:** Forces and HEIs are encouraged to monitor the data closely to understand the impact of the new programme on female representation and identify any potential barriers or inequality. Forces – and, where relevant, HEIs – are encouraged to share examples of effective practice via the National Police Jobs and Opportunities Virtual Platform.

166. HEIs offering accelerated and standard programmes may wish to undertake a focused analysis into the intersection between sex, caring responsibilities and race. This analysis will allow us to understand if additional measures need to be taken to ensure the programmes are accessible to under-represented groups.

167. HEIs are encouraged to release timetable information to people with care responsibilities well in advance, so that the student can make alternative care arrangements.

168. Some HEIs will have on-site childcare facilities. This should be included in marketing material to encourage those with childcare responsibilities to apply for the pre-join degree.

169. Forces may wish to make policing more appealing to women via targeted marketing initiatives and by offering specific support opportunities for personal development, such as mentoring and encouraging connections with staff associations.

170. Forces and HEIs may wish to consider accommodations, such as flexible working and modular learning, to support those with care responsibilities. Staff associations supporting women and carers may contribute to attraction, retention and progression.

171. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Pre-join (accelerated)**

172. **Consideration:** Research indicates that 64% of the 8.8 million people in the UK struggling with debt are women. Applicants with financial commitments or debt may find the accelerated degree particularly appealing, as the shorter course duration has the potential to be cheaper with lower overall fees, lower associated costs (for example, travel to campus) and a shorter timeframe for living expenses to accrue. It also allows the student to graduate and enter the workplace more quickly.

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173. **Mitigation:** Prospective students may be able to access student loans and maintenance grants. The HEI may also offer its own bursary or scholarship schemes. Each HEI has student support teams who can offer advice and financial guidance.

174. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Sexual orientation**

All three entry routes

175. **Consideration:** The impact of the new entry routes on applicants from LGBT+ backgrounds is unclear at present. Unfortunately, there is no workforce data on this protected characteristic. As with all protected characteristics, the entry routes have been developed to ensure that there is no adverse impact on this protected group.

176. **Mitigation:** Forces will be encouraged to collect and analyse data relating to the sexual orientation of their workforce. This data will help to inform an understanding of participation, identify limitations and support eradication of any inequality. Forces are encouraged to foster an inclusive environment that is conducive to candid and confident declaration.

177. **Key PSED objective(s) considered:** Advance equality of opportunity.

**Socioeconomic status**

All three entry routes

178. The extent to which people from different backgrounds are represented in policing is unclear at present. This is partly due to a lack of robust data collection both at a local and national level and also because there is no clear, single definition. Unlike protected characteristics, which in principle refer to a single personal attribute, socioeconomic background and/or status requires an understanding of a range of different measures.

179. In 2018, the Civil Service worked with a range of employers, industry partners and experts to develop four socioeconomic background measures. These measures are:

- parental qualifications

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68 Lesbian, gay, bisexual, transgender and other identifying orientations.

• parental occupation
• type of school attended
• eligibility for free school meals

180. We have conducted an evaluation of the new entry routes, which will include data on all nine protected characteristics and the socioeconomic status of recruits in the forces involved. The evaluation will be published in summer 2020. It will provide evidence of participation rates and the impact on disadvantaged groups.

181. **Consideration:** There is some argument that access to level six education is equitable, with a strong correlation between social background and the likelihood of pursuing higher education.\(^70\) Research has also indicated a prevalence of intersection between poverty and disability, with poverty rates being higher among families where at least one member is disabled, compared with families where no-one is disabled.\(^71\) This may limit access to the new entry routes.

182. **Mitigation:** Evidence indicates widening participation in higher education, with year-on-year increases in the number of enrolments from state-funded schools or colleges.\(^72\) UCAS reported a 0.4% rise between 2017 and 2018 in acceptances of applications from people who are from disadvantaged backgrounds (16.1%).\(^73\)

183. Forces are encouraged to develop outreach initiatives that connect with as wide an audience as possible, and to be proactive in seeking out new opportunities. Retention and progression should be monitored, with recruits provided with appropriate support mechanisms to help them achieve their potential. This also applies to the protected characteristics.

184. While socioeconomic data is not data that forces routinely collect, we will support any initiatives to facilitate data analysis so that any potential impact may be identified and mitigated for.

185. **Key PSED objective(s) considered:** Advance equality of opportunity

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186. **Consideration:** Many of the institutions piloting the accelerated programmes had anticipated that offering more flexible learning provision would widen participation.\(^{74}\)

Debt aversion is connected to who chooses to study for accelerated degrees.\(^ {75}\)

Research confirms that debt-averse attitudes are stronger among students from lower socioeconomic backgrounds.\(^ {76}\)

Debt aversion is also more common among females, mature students and those from ethnic minority backgrounds.\(^ {77}\)

The accelerated degree’s potential to cut costs may support widening participation.

### Conclusion of initial review

187. The role of the police constable is essential to policing. With crime evolving to impose new and increasingly complex challenges on policing, it is essential that new recruits are given the right training to prepare them for these challenges. Britain’s communities are also changing, with increased diversity and a growing cultural norm of valuing difference. The Policing Vision recognises that it is important that the police workforce reflects the communities it serves. Therefore, it is imperative that any initiative that might shape the demographic of the police workforce is closely reviewed, to ensure that we are promoting equality of opportunity and inclusion.

188. While access to workforce data is limited for many of the protected characteristics, there is evidence to suggest that approaches being adopted by forces and HEIs – individually and in collaboration – have real potential to attract diverse candidates to policing. We have ensured that, by integrating the EIAs into the quality assurance process, equality considerations are embedded into implementation infrastructure. For forces, this has been an invitation to engage with workforce demographics and


consider initiatives to promote recruitment, successful progression and attrition of those from under-represented groups. HEIs have undertaken the same considerations for their student body but have also embedded equality concerns into pedagogy, design and delivery.

189. Data limitations prompt us to work with our stakeholders to understand where the challenges lie and to improve processes. Without data, our ability to effectively assess equality impact is restricted. We have already begun collaboration with the NPCC, Project Uplift and the Home Office to discuss future strategies around diversity data collection. An update on this work will be provided in the next version of the EIA.

190. Diversity and inclusion teams and positive action teams across the forces are working hard to engage with people from all walks of life and to promote the many benefits of joining the police service. We are proud to be supporting this work and assisting forces to promote diversity, equality and inclusion.

191. We are committed to an ongoing review of PEQF’s equality impact. If you have any useful information that may help to support this EIA, please contact us at PolicingEQF@college.pnn.police.uk
References


Useful links


Welsh Language Commissioner. (nd). ‘Welsh language schemes’ [internet]. Available from comisiynyddygymraeg.cymru/English/My%20rights/Pages/Welsh-language-schemes.aspx
Appendix 1: Equality impact analysis

The evidence collected has been used to identify potential impact on the basis of the nine protected characteristics and socioeconomic status. The table below provides a summary.

<table>
<thead>
<tr>
<th>Protected characteristic</th>
<th>Impact</th>
<th>Key observations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Unknown</td>
<td>Neutral</td>
</tr>
<tr>
<td>Age</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Disability</td>
<td>X</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gender reassignment</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marriage and civil partnership</td>
<td>X</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Pregnancy and maternity</td>
<td>X</td>
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</tbody>
</table>

Current funding arrangements and the opportunity to earn while learning make apprenticeships appealing to a range of age groups, particularly significant proportions of older learners.

As was the case with the old entry route, a proportion of joiners will have a learning difference which could affect their ability to progress without adequate support. Forces are encouraged to review reasonable adjustment policies and work with HEIs to ensure that students are fully supported.

We welcome any data, research or other evidence of the potential impact of the new entry routes on trans individuals and communities.

We welcome any data, research or other evidence of the potential impact of the new entry routes on marriage or civil partnerships.

We welcome any data, research or other evidence of the potential impact of the new entry routes on pregnancy or maternity.
<table>
<thead>
<tr>
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<tbody>
<tr>
<td></td>
<td>Unknown</td>
<td>Neutral</td>
</tr>
<tr>
<td>Race</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Religion or belief</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Socioeconomic status</td>
<td>X</td>
<td></td>
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</tbody>
</table>
Appendix 2: Examples of emerging practice

As part of the quality assurance process, forces are requested to submit force-specific EIAs for PEQF police constable entry route implementation. The service’s commitment to developing a representative workforce has led to a strong level of engagement with the EIA process, with all protected characteristics given due consideration and true innovation emerging. Below are examples of emerging practice taken from these EIAs. To support forces, examples have also been included to help forces get creative, which are drawn from broader research surrounding engagement initiatives. Initial findings suggest that in many cases, forces and HEIs intend to adopt similar approaches to widen participation and address any issues that may arise. They also show that the methods used can apply across a range of protected groups.

<table>
<thead>
<tr>
<th>Practice</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outreach and engagement</td>
<td></td>
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</tbody>
</table>
| Specific information, advice or guidance tailored for protected groups. | • HEIs host events for potential students and give information about the university, courses and support available.  
• Officers attend HEIs and careers fairs, and promote the service as an inclusive employer.  
• Add key points from workforce policies, such as gender reassignment, annual leave for pilgrimage, accommodations for parenting and caring responsibilities.  
• ‘Meet and greet’ sessions where potential recruits come and meet serving officers.  
• Set up PEQF Q&A areas on the force website.  
• Set up a dedicated email for queries relating to recruitment via PEQF. |
<table>
<thead>
<tr>
<th>Practice</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Promotional resources promoting diversity.</td>
<td>• Tailored marketing, such as providing materials that include information on the gender and ethnic balance.</td>
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<tr>
<td></td>
<td>• Video blogs about the experience of minority group officers and new officers on YouTube and the force’s website.</td>
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<tr>
<td></td>
<td>• Research into effective use of social media streams.</td>
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<td></td>
<td>• Videos featuring individuals from protected groups and the workforce’s commitment to diversity.</td>
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<tr>
<td>Engaging local community groups, religious and community leaders, schools and colleges.</td>
<td>• Attendance and presentations at community festivals and events.</td>
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<tr>
<td></td>
<td>• Use of local radio and other media streams.</td>
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<tr>
<td></td>
<td>• Work with schools and ‘feeder’ colleges.</td>
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<td></td>
<td>• Get input from independent advisory groups made up of key community members.</td>
</tr>
<tr>
<td>Applying for equality, diversity and inclusion kite marks, charters, etc.</td>
<td>• Membership of specific groups, such as Advance HE’s Athena Swan Charter, Stonewall list of organisations.</td>
</tr>
<tr>
<td>Engage staff associations.</td>
<td>• Obtain ideas for outreach and connection.</td>
</tr>
</tbody>
</table>

### Recruitment and selection

<table>
<thead>
<tr>
<th>Introduce 'blind' recruitment.</th>
<th>• During the paper sift, remove information visible to the recruitment panel that may associate a candidate with a protected characteristic.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flexible entry requirements taking account of individual skills, expertise and experience.</td>
<td>• Most HEIs consider experience and skills where candidates do not hold the required academic qualifications for entry.</td>
</tr>
</tbody>
</table>
### Practice Examples

<table>
<thead>
<tr>
<th>Practice</th>
<th>Examples</th>
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</thead>
</table>
| Sign up to the Disability Confident scheme and ensure that the recruitment process is inclusive. | • Review recruitment processes to ensure fairness.  
• Ensure that information regarding reasonable adjustments for support with the application and recruitment process is available on the force website, or made available very early in the process.  
• Put mechanisms in place to ensure that reasonable adjustments can be made to support an applicant through the application, and that the recruitment process is fair and consistent. |
| Review application and recruitment processes.                            | • Ensure that all parts of the recruitment are inclusive and do not create obstacles for someone with a protected characteristic. For example, review the questions in a written assessment for minority group stereotypes and follow neurodiversity style guides.  
• Ensure that all those involved in recruitment have received training in equality and inclusion, and have been given time to reflect on this training. Not giving individuals the time to reflect on unconscious bias training may lead to unconscious bias. |

### Retention, attrition and progression

<table>
<thead>
<tr>
<th>Practice</th>
<th>Examples</th>
</tr>
</thead>
</table>
| Buddying and mentoring schemes for protected groups and individuals.     | • Student buddies for disabled students.  
• Reverse mentoring schemes.                                               |
| Part-time courses and blended learning.                                  | • Provision of a part-time offer will give access to those who cannot commit to full-time study or work, such as individuals with caring responsibilities.  
• Working with HEIs to develop a range of different training delivery methods to accommodate those with care responsibilities, for example, online modular learning. |
### Practice

| Ensure curriculum design and pedagogy is inclusive. | • Working with HEIs to ensure that all learning content is inclusive. This can include adjusting content for learning difference and ensuring that content does not stereotype or ostracise minority groups. |
| Dedicated staff roles offering personal support. | • Having lead staff for specific characteristics (such as disability and race), as well as personal tutors, advisers, mentors, coaches and buddies.  
• Share contact emails with any new recruit from a minority group to a ‘support network’ of force diversity, equality and inclusion practitioners, as well as diversity allies. |
| Engage staff associations. | • Establish additional support mechanisms for recruits.  
• Signpost new recruits to all available networks. |
| Regular data collection, monitoring and analysis. | • Collect student feedback through satisfaction surveys, focus groups and student forums.  
• Encourage the workforce to understand that full and candid declaration will help their force achieve the objectives of Policing Vision 2025, and will ensure that initiatives can be put in place to secure a fair and inclusive workplace for everyone.  
• Monitor progress and catch any problems early. |
| Review existing policies and introduce new policies. | • Ensure that existing policies are fit for purpose and introduce the mechanics for ensuring that all prohibited behaviours under the Equality Act 2010 are eliminated.  
• Introduce policies that will build an inclusive and fair workplace. |
| Encourage aspiration. | • One-to-one career support discussions.  
• Encourage specialist teams to offer ‘experience days’ and lead on talks about their function. |