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5 November 2024

To: His Majesty's Inspectorate of Constabulary and Fire and Rescue Services

Dear Chief Inspector

Response from Oliver Coppard, South Yorkshire's Mayor, to the HMICFRS report: An inspection into activism and impartiality in policing

I welcome the report and its recommendations. Public trust and confidence in policing is the scaffolding on which policing by consent is built and maintaining impartiality is an integral part of this.

The report acknowledges the varied relationships between PCCs and Chief Constables across policing and any clarity and consistency in approach is to be welcomed. Whilst operational independence must be maintained for each local force area, the Policing Protocol Order 2023 does not explicitly define how this is to be preserved. Given that there have also been instances where inappropriate attempts have been made to influence policing, this relationship is one which must be carefully balanced to ensure that the risk of political interference is effectively managed.

The report detailed 22 recommendations, 10 of these were specifically for forces and Chief Constables.

The recommendations for Chief Constables have been accepted by the Chief Constable of South Yorkshire Police. As the Mayor with PCC responsibilities in South Yorkshire, I have clear oversight of the implementation of these recommendations (as appropriate to South Yorkshire) through local governance arrangements. I will receive updates from lead police officers to whom each of the recommendations have been allocated for progression as appropriate.

(Recommendation 4) By 31 March 2025, the National Police Coordination Centre should amend the online reporting form to require forces to provide information about the effectiveness of the policing style adopted in the event or operation and any allegations relating to impartiality. All forces should make sure their post-event learning reviews include evidence of the effectiveness of commanders' strategies in terms of policing style and impartiality. The National Police Coordination Centre should include information about policing style and impartiality in the learning updates they send to forces.

I agree with this recommendation. Only recently, South Yorkshire Police were one of several forces responding to violent disorder within our communities. The force has been supporting the HMICFRS Rapid Review commissioned by the Home Office but are also in the process of carrying out a full debrief to draw upon learning from all aspects of the operation. It is important that we seek to understand the experience of members of our local communities in respect of important issues such as community cohesion which plays a critical part in improving public trust and confidence.

I also have an Independent Advisory Panel on Policing Protests. This panel is able to convene quickly where we see protests and demonstrations. They provide independent support and challenge to SYP in the planning and learning stages of managing protests and marches, across South Yorkshire and also provide independent observations to those protests that may come under public scrutiny.

I welcome the inclusion of policing style and impartiality into any post learning reviews and the Independent Advisory Panel can help contribute to any learning.

(Recommendation 9) Within six months of the College of Policing updating its engagement and communication authorised professional practice, forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

I agree with this recommendation and will monitor progress through existing local governance arrangements.

(Recommendation 10) By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise. The National Police Chiefs' Council should support chief constables in achieving a consistent approach.

I agree with this recommendation in principle and welcome the support of the National Police Chiefs Council (NPCC) in supporting Chief Constables however, even with NPCC support, implementation of this recommendation could still be a challenge for Chief Constables.

A consistent approach is required to build and maintain confidence in the impartiality of decisions taken. This consistency will not be achieved if each Chief Constable is expected to weigh issues in isolation and so I would support national intervention from the College of Policing or Home Office.

(Recommendation 12) By 31 July 2025, chief constables should make sure that those personnel responsible for completing equality impact assessments are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

I agree with this recommendation and will monitor progress through my governance arrangements.

Locally, we will consider how to bring the voices of different communities into these processes so that the importance of Equality Impact Assessments are well understood.

(Recommendation 13) By 31 March 2025, all chief constables should audit their policies that include or relate to the Equality Act 2010. They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

I agree with this recommendation and will monitor progress through my governance arrangements.

(Recommendation 16) By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

I agree with this recommendation. South Yorkshire Police' policy on dealing with hate and non-crime hate incidents was updated earlier this year (April 24). It is accessible for staff and officers and includes links to both the Home Office guidance and the College of Policing Code Of Practice.

(Recommendation 17) By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to hate crimes and non-crime hate incidents.

I agree with this recommendation in principle. However, the report recognises the system challenges in the recording of hate related incidents and the retrieval of data. This issue is a complex one and requires a coordinated approach as we would not want to lose sight of what hate incident data is telling us even where there isn't a crime to be recorded and investigated. Given what we know about IT challenges in policing generally, the proposed timescale for this recommendation may not be realistic. There may also be a cost to changing IT systems for some forces that has not been recognised in this recommendation. Given the complexities associated with different IT platforms across policing perhaps this is an area where the Police Digital Service could assist in support and coordination.

(Recommendation 18) By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

I agree with this recommendation and will monitor progress through my governance arrangements.

(Recommendation 20) By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from 'Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data', the force should record the rationale for this.

I agree with this recommendation. South Yorkshire Police' policy on dealing with hate and non-crime hate incidents was updated earlier this year (April 24). It is accessible for staff and officers and includes links to both the Home Office guidance and the College of Policing Code Of Practice. It details the code of practice on the recording and retention of personal data.

(Recommendation 22) By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

I agree with this recommendation in principle. As the report highlights, there are large numbers of staff networks across Police forces. Governance structures have been improved for networks in South Yorkshire Police and a charter introduced to ensure consistency across the current twelve staff networks. This sets out the expectations from networks and defines the remit; in-line with the force's strategic plans; and national guidance around networks.

Staff associations in South Yorkshire Police are overseen by an Equality Hub. This acts as a coordinating and governance layer for the staff networks and the force has had interest from other forces and organisations which aspire of achieving a similar structure; hoping to learn from the experiences of the force in implementing and maintaining the setup.

Commenting more broadly on the report, I support and acknowledge the wider recommendations including the need for more comprehensive guidance and training for police officers in respect of the impartiality duty. The uplift in Police Officers is welcome but we need to be confident that all officers and those training officers including higher education establishments, fully understand the importance of remaining balanced and impartial and that this is embedded in organisational culture.

I am pleased that in South Yorkshire, the Police are working collaboratively with other public service authorities and blue light service staff networks. This presents some real opportunities for coming together to share best practice across networks and to explore efficiency opportunities. For example, blue light service staff networks came together recently to celebrate Black History Month.

I look forward to working with you both to keep people safe across South Yorkshire.

Yours sincerely

Oliver Coppard
South Yorkshire's Mayor