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Our Ref: IM-FOI-2022-2604
Date: 12th January 2022



FREEDOM OF INFORMATION (SCOTLAND) ACT 2002

I refer to your recent request for information which has been handled in accordance with the Freedom of Information (Scotland) Act 2002.

For ease of reference, your request is replicated below together with the response.

1. Please provide a copy of your force's Equality Diversity and Inclusion policy.

Following a clarification request, you confirmed that you were referring to any Equality Diversity & Inclusion policies that you operate, whether they relate to internal HR/personnel/staff/Police Officers/employees etc or to interactions with the public.

Please be advised that the requested information is publicly available.

As such, in terms of Section 16 of the Freedom of Information (Scotland) Act 2002, I am refusing to provide you with the information sought. Section 16 requires Police Scotland when refusing to provide such information because it is exempt, to provide you with a notice which:

- (a) states that it holds the information,
- (b) states that it is claiming an exemption,
- (c) specifies the exemption in question and
- (d) states, if that would not be otherwise apparent, why the exemption applies.

I can confirm that Police Scotland holds the information that you have requested and the exemption that I consider to be applicable is set out at Section 25(1) of the Act - information otherwise accessible:

“Information which the applicant can reasonably obtain other than by requesting it under Section 1(1) is exempt information”

I can confirm that the information requested is available through our website at the link below:

Equality, Diversity and Dignity SOP

<https://www.scotland.police.uk/spa-media/3lka0za4/equality-diversity-and-dignity-sop.pdf>

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2. Which internal and external parties gave advice/were consulted on the development of the policy? Who was responsible for signing off on the policy?

I can confirm that the following staff associations made contributions to the policy:

Christian Police Association
Disability and Carers Association
Gay Police Association
Gypsy Roma Traveller's Police Association
National Trans Police Association

The policy was signed off by Eileen Moore who was Head of Reward and Policy at that time.

3. Please provide copies of Equality Diversity and Inclusion training materials used with staff; used with volunteer members of the public.

In response to your request, I regret to inform you that I am unable to provide you with the information you have requested, as it would prove too costly to do so within the context of the fee regulations.

As you may be aware the current cost threshold is £600 and I estimate that it would cost well in excess of this amount to process your request.

As such, and in terms of Section 16(4) of the Freedom of Information (Scotland) Act 2002 where Section 12(1) of the Act (Excessive Cost of Compliance) has been applied, this represents a refusal notice for the information sought.

By way of explanation, equality, diversity and inclusion (EDI) is discussed in some way in all of the training courses Police Scotland runs. Due to the amount of courses we run and the large amount of training material these courses contain, each would have to be fully reviewed to determine what materials related specifically to EDI.

In this case thousands of documents/online resources would need to be manually checked. This would take many hundreds if not thousands of hours to complete.

Police Scotland have assessed that the £600 cost limit within the Act equates to 40 hours of work and so this part of your request would breach the cost threshold.

To be of some assistance however, our training department have provided the following breakdown.

Learning Training and Development (LTD) Portfolio

Overview

Since 2019, LTD have regularly improved the Equality, Diversity and Inclusion (EDI) content within this learning portfolio. A variety of learning products are available to ensure colleagues receive appropriate levels of support at different stages of their career. This support is delivered through a variety of learning products that cover core, operational and specialist learning needs, defined by role requirements and delivered at specific points

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within a career lifecycle e.g. induction, promotion and to maintain operational/specialist competence.

In addition, a new EDI learning programme has been designed for all colleagues. This programme mainstreams EDI through a variety of learning products with a focus on mind-set and behaviour change through holistic skills development (emotional, mental and intellectual) that is practical for every day policing regardless of role. Leading EDI specialists endorse a continuous programme of learning that sets out clear performance expectations linked to strategic objectives. A continuous learning approach aligned to organisational change initiatives and strategic objectives has been proven to provide long term sustainable change compared with inconsistent results from performative one off learning events. In recognition of this best practice approach, all LTD EDI learning products are aligned with the strategic objectives detailed in the Joint Strategy for Policing and Policing Together.

Full details of the learning products available to colleagues are detailed below and are presented under the headings of core, operational and specialist as detailed above to illustrate the colleague learner journey at different stages of the career lifecycle.

Core Learning Products

Probationer Training Programme (PTP)

There is a an 8 hour lesson for EDI with plans to further embed scenarios and topics throughout the 12 week programme to ensure effective blended learning with robust practice and consolidation. The lesson covers a variety of EDI topics including: discrimination, prejudice, stereotyping, bullying, victimisation, harassment, bias, privilege, protected characteristics and equal opportunities.

Staff Induction

Similar to PTP, there is 7 hours of EDI learning within the 2 day staff induction.

Mandatory e-learning module

The module will be mandatory each year for all colleagues to maintain and refresh knowledge and re-affirm expectations. The content covers the legal, moral and ethical requirements for all colleagues, aligned to our values and standards of professional behaviour.

Operational Learning Products

Operational Safety Training (OST)

A detailed review of the OST programme was undertaken and more instinctive, simplistic and effective techniques introduced into the syllabus. Face-to-face training in relevant First Aid re-introduced with new content, including the management of catastrophic bleeds and use of defibrillators as well as how bias can impact decision making. A primary focus of the programme is to provide students with a developed understanding of theory through meaningful and comprehensive presentation; stressing the importance of de-escalation tactics to seek compliance and peaceful resolution over the use of physical force wherever

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possible. Through this emphasis, the intention was to increase the knowledge of officers and staff, and reduce the risk of injury to themselves, subjects and the wider public in volatile and potentially violent situations.

Tutor Constables

Recognised as a critical role within the Service to ensure that our values and standards of professional behaviour are consistently evidenced by constables during their probationary period. The Tutor Constable course sets out clear EDI standards and expectations in an operational context for all Tutor Constables. This is a 1 day online learning programme and there are plans to further develop the support provided to Tutor Constables with the provision of additional Continuous Professional Development (CPD) sessions, as required.

Cimplexity

One of the first national policies adopted by Police Scotland was in relation to Critical Incident Management. Police Scotland defines a critical incident as: 'Any incident where the effectiveness of the police response is likely to have a significant impact on the confidence of the victim, their family and/or the community'. The policy focusses on the identification and escalation of critical incidents, and specifically considers the challenges around incidents with a diversity or Hate Crime element. It seeks to help ensure appropriate internal and external advice is looked for as soon as possible after the event, and also guides officers towards giving greater consideration to repeat victims, particularly within minority communities.

Specialist Learning Products

Transforming Climate Learning Programme

This CPD programme provides an opportunity for Senior Leadership Teams to learn together to identify barriers, opportunities and solutions to improve climate through the lens of psychological safety which will in turn contribute to the delivery of our strategic commitments and continue to progress long-term sustainable cultural change for the organisation. Ineffective team working is a common failure point for organisations for cultural change and it is also recognised that team climates impact the success of overall culture change. This CPD approach for teams will develop a collective consciousness across the senior leader population which will translate into a consistent and committed narrative to all colleagues about EDI expectations which is essential to drive organisational change.

Continuous Professional Development (CPD)

The CPD portfolio includes 16 facilitated bite-size learning products that focus on mind-set and behaviour change. This learning product is called 'Empower Hours'. From this product range there are 3 that specifically focus on EDI to develop self-awareness about inclusion, bias and invisible advantage – 'Inclusion starts with I', 'Unconscious Bias' and 'How to be an Ally'.

For self-directed learning there are over 2000 learning resources available to colleagues 24/7 in the online learning resource 'How-To' provided by globally recognised learning provider MindTools.

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The resources in 'How-To' take between 5-60 minutes to complete, focus on mind-set and behaviour change, with a curated playlist for EDI topics.

In addition, there is also a Police Scotland CPD intranet page with over 40 printable learning resources called 'Learning Nudges' providing micro-learning options for colleagues that have limited time, typically taking just 15 minutes to complete. 21 of these resources specifically focus on EDI topics.

Training Standards

LTD is committed to providing training of the highest quality that provides officers and staff at all levels with the knowledge and skills to carry out their role effectively. All of our training is underpinned by a comprehensive national Quality Assurance (QA) Framework which helps us to achieve the highest standards in our learning provision. These standards are also recognised externally and allows us to award formally recognised qualifications through the Scottish Qualifications Authority (SQA) and to award formal Scottish Credit and Qualifications Framework (SCQF) credit points and level to our programmes. The development and application of the framework is overseen and managed by a dedicated Training Quality Assurance (QA) team who provide professional support and advice and who also conduct formal monitoring of programmes against a range of QA criteria.

All officers delivering LTD learning products complete the Certificate in Training, Learning and Assessment (SCQF Level 7), ensuring best practice training standards with oversight by the Quality Assurance team. In addition, all officers attend a 4 day Diversity and Inclusion awareness course. For CPD assurance standards, there is a plan to independently accredit the CPD portfolio using the industry leading CPD Accreditation Service.

4. Who delivers this training?

As the answer to question 3 is an excessive cost exemption, this question is no longer applicable. The information provided to be of assistance above however does provide some of the details requested.

5. Who conducts the Equal Opportunities monitoring?

The Equality & Diversity Team within People and Development.

6. Which characteristics/groups are included in the Equal Opportunities monitoring?

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I can confirm that the information requested is available through our website at the link below:

https://www.scotland.police.uk/spa-media/ftbagc0p/employment-monitoring-report-19-20_4723_21_ar-v1-final.pdf

Should you require any further assistance please contact Information Management quoting the reference number given.

If you are dissatisfied with the way in which Police Scotland has dealt with your request, you are entitled, in the first instance, to request a review of our actions and decisions.

Your request must specify the matter which gives rise to your dissatisfaction and it must be submitted within 40 working days of receiving this response - either by email to foi@scotland.police.uk or by post to Information Management (Disclosure), Police Scotland, Clyde Gateway, 2 French Street, Dalmarnock, G40 4EH.

If you remain dissatisfied following the outcome of that review, you are thereafter entitled to apply to the Office of the Scottish Information Commissioner within six months for a decision. You can apply [online](#), by email to enquiries@itspublicknowledge.info or by post to Office of the Scottish Information Commissioner, Kinburn Castle, Doubledykes Road, St Andrews, Fife, KY16 9DS.

Should you wish to appeal against the Office of the Scottish Information Commissioner's decision, there is an appeal to the Court of Session on a point of law only.

As part of our commitment to demonstrate openness and transparency in respect of the information we hold, an anonymised version of this response will be posted to the Police Scotland Freedom of Information [Disclosure Log](#) in seven days' time.