

Police Service of Northern Ireland

Race and Ethnicity Action Plan 2025-2027

**Response from the Commissioner Designate
for Victims of Crime for Northern Ireland**

December 2024

1. About the Office of the Commissioner Designate for Victims of Crime

- 1.1 The Commissioner for Victims of Crime's Office (CVOCO) is an independent body which represents the interests of victims of crime in Northern Ireland. The Commissioner Designate was appointed by the Minister of Justice in March 2022 to be an independent voice for victims of crime. The overarching purpose of the Commissioner Designate is to represent the needs and interests of all victims of crime and help drive systemic improvements across the criminal justice system.
- 1.2 This will include helping to identify any areas where victims are not consistently being provided with their entitlements set out within the Victim Charter and ensuring that their issues and experiences are raised in the public arena, with Government, with criminal justice organisations and organisations that support and represent victims, in order to bring forward effective change.

2. Overall thoughts on the Race & Ethnicity Action Plan

- 2.1 The Commissioner Designate welcomes the draft PSNI Race and Ethnicity Action Plan and the opportunity to contribute to its development. The plan sets out a strong and positive message that the PSNI is committed to ensure ethnic minority people including PSNI staff feel safe, valued by and engaged in policing. The goal for the PSNI to be an "*actively anti-racist organisation where we actively demonstrate upstander behaviours against racism and prejudice*" is an excellent one, as are the commitments to be trustworthy and strive for excellence in diversity, equality and inclusivity. It is also positive that the action plan is grounded in human rights including the ECHR.
- 2.2 The Commissioner Designate warmly welcomes that victims of crime from ethnic minority communities are central to the action plan. The recognition of past failings by the PSNI in supporting ethnic minority communities, as well as the acknowledgment that the PSNI is not immune to racism, discrimination and bias, is an honest and healthy starting point from which to formulate this action plan. In line with recommendations made for the London Metropolitan Police Service by the Casey review, such a declaration clears the way for constructive

cultural reform and building better community confidence in the service. This approach is key if trust in policing is to be improved within ethnic minority communities. As Baroness Casey noted in her review:

“(W)e have to be able to have faith in the police. They stand in the way of danger for us. We need to be able to tell our children to go to them when they are in danger. We give the police exceptional powers and we trust them to use them responsibly. That is how policing by consent works.”

This statement is as true for our ethnic minority communities as it is for any other communities here.

- 2.3 The plan should also be commended for making a strong and unambiguous statement on the violence targeted at ethnic minority communities in summer 2024. The assessment that the violence was perpetrated with the *“singular intent of terrifying communities and inciting hatred”* is a welcome sign that there is no place for mitigation or excuse for the victimisation of ethnic minority communities here.
- 2.4 The Commissioner Designate notes that action plans for each individual workstream will be forthcoming in the next 12 months, and that this action plan is therefore intended to be a high level summary of what the PSNI intends to do. **This limits the feedback that can be provided to the plan, as the detail of how the aims, aspirations and workstreams will be delivered upon is a key component to assessing whether the plan is robust and capable of being delivered upon successfully. The Commissioner Designate urges that the individual action plans are developed swiftly and that ethnic minority groups, individuals, support services and victim support organisations are fully consulted on their content.**
- 2.5 To ensure the best chance of successful delivery, ongoing and robust community engagement should be built into every stage of the plan’s development and delivery, including subsequent action plan development and monitoring the success of the actions that flow from them. The views of communities for whom this plan has been formulated, and of ethnic minority victims of crime, should be central to the evolution of this work and taken into account and embedded throughout. The Commissioner Designate therefore welcomes that the PSNI *“invite continuous feedback on the plan and how we are delivering on our commitments and want to work in partnership to make sure we are getting it right”* – this is a firm footing on which to launch the action

plan, and it is the hope of the Commissioner Designate that such holistic and open processes to inform and improve on the action plan will become a reality in practice.

- 2.6 The action plan and all subsequent plans that flow from it should be explicitly grounded in the Victim and Witness Charters, which outline the rights and entitlements of victims and witnesses of crime and what they should be able to expect at a minimum from the police.
- 2.7 It is essential that delivery of the plan is monitored by robust data which captures levels of compliance and impact of the actions therein. To that end, the Commissioner Designate welcomes proposals within the Department of Justice consultation on the Victims and Witnesses of Crime Bill to include a provision which will compel criminal justice organisations to provide or publish statistical victim information, including evidence of Victim Charter compliance.

3. Protecting ethnic minority communities

- 3.1 Taking effective steps to protect our ethnic minority communities is more important than ever, particularly given the worrying uptick of racist and anti-migrant violence seen both here and across the UK and Ireland. The PSNI plays a central role in safeguarding ethnic minority individuals and communities and providing reassurance that they are protected, welcome, and will be taken seriously if they feel targeted or unsafe.
- 3.2 The focus on victim protection and support in Workstream 4 is encouraging, particularly that it encompasses both responsive and preventative approaches. However, the plan lacks detail as to how this will be delivered in practice. The Commissioner Designate looks forward to more detailed actions in the dedicated Workstream 4 action plan and the opportunity to contribute meaningfully to its development.
- 3.3 The Commissioner Designate agrees that improving the quality of investigations for minority ethnic victims and bringing those responsible to justice is key. Whilst this responsibility does not only fall to the PSNI, police play a vital role in investigating crimes against ethnic minority individuals and communities and providing a strong evidence base to ensure robust justice outcomes. In the course of her work, the Commissioner Designate has heard anecdotal evidence from both ethnic minority victims and the organisations

that support and advocate on their behalf that inconsistencies persist in how reports of crime, including hate crimes and incidents, are handled.

- 3.4 These include trivialising of hate incidents and a failure to understand the severe impact particularly of repeat targeting and victimisation and how traumatised and unsafe this can make communities feel. This is the case for all categories of people who are attacked on the basis of their identity, but can be particularly stark for those who feel easily targeted due to visual representations of their perceived 'otherness' such as the colour of their skin or wearing hijab. Reports from victims and advocates include officers insisting on treating cases of hate incidents and crimes as anti-social behaviour or mutual antagonism, or telling advocates that recording a hate motivation results in "too much paperwork" for them. Victims also report feeling that some officers fail to recognise the amplified impact that seemingly 'low level' incidents can have on their mental health and sense of safety, or the cumulative impact of repeated and targeted attacks on an individual, family, or community.
- 3.5 Victims and support organisations have also reported cases in which hate incidents and crimes appear to be de-prioritised by officers, who begin from the starting point that a crime is unlikely to be solved or a suspect identified so fail to interview key witnesses or follow up on leads. One example brought to the attention of the Commissioner was that of a victim of hate crime who provided information on the identity of the perpetrators, yet six weeks after the report no action to interview the suspects or follow up on any information or interview other key witnesses had been carried out. Victims can be left feeling that they must do their own investigating otherwise no action will be taken, or that they are having to 'pester' officers on progress of investigations. Further evidence from Hate Crime advocates includes concerns that some officers may prematurely make recommendations to PPS for no prosecution without having made sufficient efforts to investigate. They also point to cases in which individual officers may be less sympathetic to ethnic minority victims, indicating unconscious or conscious bias in how reports from ethnic minority victims are handled. Advocates were also keen to point out that, in other cases, officers are proactive, engaged, empathetic, and communicative. In such cases, even if a justice outcome was not achieved, victims felt supported and safer knowing that the police were taking what has happened to them seriously. This highlights the value of getting it right when engaging with ethnic minority victims, and also that there are good practice examples out there of how the

PSNI is getting it right already. What is missing is consistency of approach across the service.

- 3.6 One concrete means of improving the policing response to racial hate crime in particular is to ensure consistent application of Perception Test policy¹ of believing and recording a crime or incident as motivated by hate if victims tell police they believe this to be the motivation. Anecdotal reports from victims and their advocates indicates that this is not currently being applied uniformly, with negative consequences for victims who feel that their experiences are being minimised or dismissed and their safety not being prioritised. It would be helpful if this was specifically referenced in the action plan. Another issue reported to the Commissioner Designate is that it may not be appropriate to ask child victims if they perceive that a crime or incident affecting them was motivated by hate. Some children may not fully grasp the motivations behind attacks against them or be unwilling to disclose that they feel the motivation was racial hatred. In such cases a more nuanced approach is necessary to apply professional curiosity and ask parents/guardians and adult witnesses if they perceive that the crime against the child was motivated by hate.
- 3.7 Under the prevention action in the plan, more detail is required as to how this can be achieved. The Commissioner Designate recommends that actions should include commitment to better disruption of repeat incidents to prevent escalation, and taking prompt and robust action when hate incidents and crimes do take place to send a strong message that hate will not be tolerated by police.
- 3.8 The Commissioner Designate is encouraged by the inclusion of an action to review and enhance accessibility of language services. Advocates from the HCAS service report inconsistency of approach by police in offering appropriate interpreting services where needed. Examples include wrongly assuming that because a victim has a basic or intermediate level of English that they will be able to convey nuances of what has happened to them or will understand the technical level of English used when discussing the specificities of crime and justice processes. Other examples include inappropriately relying on family or community members to provide interpretation. In one instance reported to the Commissioner Designate, a child who was victim of a racist assault was asked to interpret for their parent who was being interviewed as a witness. Such approaches do not account for the

¹ PSNI SI 2117 [Hate Crime 25 April 2023.pdf](#)

trauma experienced by those asked to interpret, the proficiency of interpretation from those without training or accreditation in interpretation, or issues arising if there are intimate details that a victim may be reluctant to share with police via an interpreter whom they know personally.

- 3.9 The Commissioner Designate notes that problem solving initiatives are highlighted within the action plan under Workstream 4. Whilst this approach is useful in principle, clarity is needed to ensure that police have a full understanding of when such an approach is appropriate, and apply problem solving in a manner which accounts for the power imbalance between victim and perpetrator. This is particularly the case in hate-motivated crime, where being targeted on grounds of race add a level of vulnerability to victims that may not be present in standard neighbourhood disputes or attacks motivated by mutual animosity. Problem solving methods should never leave victims feeling further disempowered and unprotected, or pressurise victims to accept resolutions that are not appropriate or don't protect them. The plan should affirm that the voices, views and safety of victims will be central to any problem-solving approaches.
- 3.10 The Commissioner Designate welcomes the recognition of the work of the Hate Crime Advocacy Service and the action to promote the service. It would be useful if this action went further to also make a commitment for police to work with advocates for the benefit of victims of racial hate crime and recognise the central role that the advocates play in being a voice for victims throughout the justice process including at investigation stage.
- 3.11 Finally, the inclusion of a specific action on the policing response to refugees, asylum seekers and migrants is welcome. Under this strand it would be useful to reference the work of the Immigration Status Group in formulating a new policing approach to refugees, people seeking asylum and those with insecure immigration status. It is well-evidenced that these victims are particularly vulnerable and less likely to report crimes against them due to fear of their victim status being treated as secondary to their immigration status. Reassurance within the plan that the PSNI puts refugee and asylum seeking victims first, and is primarily interested in their safety and security as opposed to their immigration status, would be a very positive addition to the plan.

4. Community engagement

- 4.1 The Commissioner Designate welcomes that the action plan is underpinned by the Public Engagement Pillars which include commitments to community focused and collaborative engagement, effective neighbourhood policing focused on local engagement and community problem solving, and local accountability to victims. It is also positive that the action plan acknowledges past police action that caused trauma and distrust.
- 4.2 Again, whilst the actions and aims outlined in the plan are positive, Workstream 3 lacks sufficient detail as to how all the aims might be achieved.
- 4.3 The Commissioner Designate supports the commitment to ensure more timely and meaningful communication with ethnic minority victims about police decisions and how they were reached. This links directly with victim entitlements under the Victim Charter. It would be valuable to expand this action to add that communication will be in a way that is easily understood and that police will ensure that they understand fully what the victim is telling them so they can respond appropriately.
- 4.4 Under the action to “enhance confidence of victims of hate crime to come forward to police”, the Commissioner suggests that the most effective means of achieving this is to ensure that hate crime is taken seriously and robustly investigated as appropriate in all cases. Community confidence in policing is profoundly impacted by their members’ past negative experiences of policing. Communication plans are only useful if they are accompanied by consistent, proactive demonstrations of competence and care by police.
- 4.5 Finally, whilst the pledge to develop communications and community engagement plans are encouraging, more detail is required as to what these plans will do and what they seek to achieve. Central to any work around communications and community engagement must be an acknowledgment that communication is a two-way street, where listening to what communities are saying is as important as communicating what the police plan to do. Two-way engagement is also at its most invaluable when there is follow-up after engagement to demonstrate what the PSNI has taken on board and how it has improved based on what communities feed in to engagement. For instance, while models like the of the Reference, Engagement and Listening (REaL) events have their place, there is no mechanism in place to feed back to participants how their views have been taken on board and what positive

changes have been made. This follow up is vital to meaningful engagement and fostering community confidence.

- 4.6 It is also important that communications reflect the reality of what the PSNI are doing on the ground and frankly convey the levels of safety that can actually be offered to ethnic minority people. Messaging which creates a false sense of safety or which lauds initiatives that are not working in practice may ultimately damage confidence in policing and statutory agencies if the reality does not match the messaging being sent out.

5. Monitoring and Evaluation

- 5.1 Monitoring is essential to the success of this action plan if it is to be a dynamic, living document capable of pivoting to new approaches if existing initiatives are not achieving the desired outcomes.
- 5.2 Collection and analysis of meaningful, quantitative and qualitative data will be pivotal to the success of this action plan, and is a key strategic aim of the office of the Commissioner for Victims of Crime. The Commissioner Designate looks forward to seeing the detailed action plan attached to this workstream and the proposed evidence and data that will be used to ensure this plan's success.
- 5.3 Meaningful monitoring and evaluation requires the input of the communities to which the plan is aimed, and so it would be helpful to explicitly include community feedback under Workstream 5. The Commissioner Designate would be eager to work in partnership with criminal justice agencies and support organisations to develop a comprehensive mechanism to capture the experiences of victims of crime. This would assist in monitoring the impact of police plans, including the race & ethnicity action plan.

6. Training

- 6.1 The commitment to enhanced training programmes, that include upstander and cultural intelligence training, is a welcome addition to the action plan. Robust, ongoing training will be essential to ensure the Police Service of Northern Ireland is culturally competent and responds to the individual needs of officers, staff and people from ethnic minority communities. Any training should be high quality and developed by accredited experts from ethnic

minority organisations and victim support groups to ensure it is fit for purpose. Training should build cultural understanding and clarify what being part of an anti-racist police service means in practice, as well as tackling unconscious bias. Training should be ongoing for all officers, old and new, and build in refresher training at periodic intervals throughout the career span. Specific training should also be developed for occasions where someone is identified as having a particular need – in such cases, online self-completion modules are unlikely to be sufficient to precipitate the required behavioural change.

6.2 Ensuring the embedding of training and successful cultural change can also be aided by the establishment of key race champion roles at various levels of the PSNI. These roles should have a clear remit and outcomes and should form a meaningful part of an organisation-wide effort to effect cultural change at all levels of the police service. Such roles should also avoid pigeonholing the issue to just a small group of champions – being anti-racist and proactive in delivering on the action plan should be the role of all staff and officers across the service.

7. Addressing misconduct

7.1 The Commissioner Designate notes that actions on appropriate misconduct proceedings are included under workstreams 1, 2 and 3. Dealing effectively with officers and staff whose conduct falls short of the standards required of them is key to transforming institutional culture towards one of anti-racism. As reinforced by the Casey review, clarity about what is and isn't acceptable conduct, and unambiguous consequences for those who fail to meet those standards, are essential to cultural transformation. This is the case for both discriminatory conduct against ethnic minority officers and members of the public, whether they be suspects, victims or witnesses. Robust regulatory frameworks are vital to keeping intact the integrity of policing institutions.

7.2 With this in mind, it would be useful to include more detail in the plan on how the PSNI proposes to review its own regulatory frameworks and how it deals

with those who act in a racist or discriminatory manner in the course of their work or in personal public spaces such as on social media accounts. Actions should espouse a 'zero tolerance' approach and commit to actively weed out behaviours and cultures that are discriminatory or racist. The test as to whether these actions have succeeded will be if staff or members of the public who witness racist or prejudicial conduct by police officers feel confident in reporting. Those who report racism, discrimination and prejudice should be confident in the knowledge that reporting is worthwhile and encouraged. If people feel that reporting is a waste of time, or worse that it may potentially inhibit their career progression as police or make them a target for further unacceptable behaviour as members of the public, this plan will have failed. Proof to local communities that tangible, transparent action will be taken in cases of misconduct or racial bias will help build community confidence that the PSNI means what it says about wanting to be a truly anti-racist service. Similarly, whilst it is welcome that the plan has an action to "*equip frontline supervisors who create an environment of support and allyship*", it would be helpful if detail was included as to how this might be achieved.

8. Recruitment

8.1 Improving recruitment and retention of ethnic minority staff and officers in the PSNI are important steps towards the successful integration of a zero tolerance ethos. For victims of crime, rebalancing the ethnic composition of the PSNI to make it more reflective of our society will help build confidence that the PSNI is a service for the whole community which polices by consent.

8.2 Ensuring sufficient staffing numbers more generally would also help create the right conditions for necessary cultural change within the PSNI. As the Casey Review acknowledged:

"...insufficient resourcing leads to a police service that is highly stressed and not sufficiently supported to protect mental health and avoid desensitisation towards victims and the public."

In such conditions and faced with understaffing due to resourcing issues and high levels of sick leave, the review notes that "*it is easier for (supervisors) to ignore poor performing officers or let those with conduct issues get away with bad behaviour.*"

8.3 The Commissioner Designate recognises that a depleted police service is one in which valuable neighbourhood policing work suffers, as officers are pulled away from their local beat to assist with emergency response, events and other high priority matters. Consequently it is difficult to build a relationship with local communities, especially those ethnic minority communities who feel they have already been let down by the service, if police staffing levels preclude them from doing that community building work day and daily on the ground. It is therefore welcome that actions relating to recruitment and retention of ethnic minority staff are included in the plan. It is clear, however, that resources will be required to address recruitment and staffing levels, both of ethnic minority officers and the police service as a whole.

If you would like to discuss any of these points in further detail, please contact the office via:

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