



POLICE AND CRIME COMMISSIONER FOR CLEVELAND

Equality and Diversity

FINAL Internal Audit Report: 8.25/26

19 November 2025

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AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix C, the overview of our findings is detailed below.

Background: This audit was undertaken to assess the Force’s approach to Diversity, Equality and Inclusion (DEI) across strategy, implementation, governance, and statutory compliance and to ensure the organisation has an appropriate framework in place. The review assessed the Force’s implementation of the NPCC Workforce Representation Toolkit, including attraction, recruitment, progression and retention, and how these are embedded within the People Strategy 2023–2026.

The Force’s People Strategy 2023–2026 sets out its approach to attracting, recruiting, developing, retaining, and supporting its workforce. DEI objectives are embedded within this strategy and are supported by formal governance structures, including the Strategic Workforce Planning Board (SWPB), chaired by the Deputy Chief Constable. DEI objectives are embedded across the employee lifecycle and supported by targeted initiatives, including Positive Action programmes, staff networks, and external accreditations such as Disability Confident Level 3 and Armed Forces Gold. The Force has demonstrated a commitment to inclusive culture through leadership development, induction training, and a Cultural Calendar. Governance structures are in place to monitor progress, with opportunities to strengthen external challenge and enhance visibility of outcomes.

Conclusion: We found that Cleveland Police has established a comprehensive framework to support DEI with strategic oversight provided by the SWPB and supported by targeted initiatives, including Positive Action programmes staff networks, and external accreditations such as Disability Confident Level 3 and Armed Forces Gold. Overall the Force demonstrates a structured, compliant, and proactive approach to DEI, with clear evidence of strategic intent and operational delivery.

Internal audit opinion:



Minimal Assurance



Partial Assurance



Reasonable Assurance



Substantial Assurance

Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

Audit themes:

Equality and Diversity Objectives

Equality and diversity objectives are embedded across the Force’s strategic framework, our review confirmed this included the DE) Strategy (2024), People Strategy (2023–2026), and Force Strategy (2023). These documents align with the Public Sector Equality Duty and Equality Act 2010, and are accessible to staff via SharePoint. Governance arrangements include reporting through advisory panels to the IMPACT Board and Strategic Workforce Planning Board. The DEI Policy (2022) supports these objectives but is currently under review and has not yet been updated or republished, which may impact clarity and consistency in policy application.

Workforce Representation and Progression

We found that the Force has adopted a comprehensive approach to improving workforce representation and progression, supported by initiatives such as the Women’s Working Group, HeForShe programme, and Positive Action Working Group.

These are underpinned by quarterly DEI dashboards that track representation, progression, public confidence, and hate crime. Governance is provided through the Strategic Workforce Planning Board and Tactical Workforce Planning Board, with action logs and meeting minutes evidencing ongoing review.

External Accreditations (Disability Confident Level 3 & Armed Forces Gold)

We confirmed that the DEI team is responsible for securing and maintaining external accreditations, which are achieved through annual submissions to accrediting bodies. The Force was awarded Disability Confident Leader Level 3 in August 2024 and Armed Forces Gold status in June 2024. This demonstrates the Force's commitment to inclusive employment practices and its alignment with national standards.

Embedding Representation in Ways of Working, Leadership and Cultural Competency

We confirmed that workforce representation is embedded into leadership development and cultural competency through structured programmes and initiatives. The First Line Leadership Programme (FLLP) and Police Executive Leadership Programme (PELP) include modules on inclusive leadership, supported by bespoke DEI training (e.g. for Force Control Room staff in January 2025). Cultural competency is promoted through initiatives such as the Faith Trails Course, Police Race Action Plan, and Race Equality Network events. We also confirmed that DEI content is also introduced during induction for police officers and staff, ensuring early engagement with inclusive values.

Equality Impact Assessments (EIAs)

The Force has established a comprehensive EIA framework, including training, guidance documents, process flowcharts, and a tracker to monitor completion. Our review confirmed that EIAs are used to assess the impact of policies and procedures on diverse communities. A sample review of 12 policies found that only five had up-to-date and signed EIAs available via SharePoint or the website. The remaining seven had passed their review dates, including key documents such as the Recruitment and Selection Policy and Health and Safety Policy. However from our review and in discussion with the HR Policy Advisor we confirmed that EIAs are reviewed in line with the policy which was introduced two years ago and is business as usual so going forward any EIAs will be reviewed when the policy is next reviewed.

Inclusion and Cultural Events Plan

We confirmed that the Force has developed a Cultural Calendar for 2025/26, categorising events as bronze, silver, or gold based on scale and significance. Events such as Black History Month, International Women's Day, and South Asian Heritage Month are actively promoted through internal communications and supported by staff networks. Evidence of delivery includes presentations, training sessions, and collaboration with external organisations. Feedback is collected informally and formally (e.g. Faith Trails), and discussed at Staff Equality Forum meetings to inform future planning. The Force also maintains a Positive Action Working Group tracker to monitor engagement events throughout the year.

Use of National Guidance and Delivery Plans

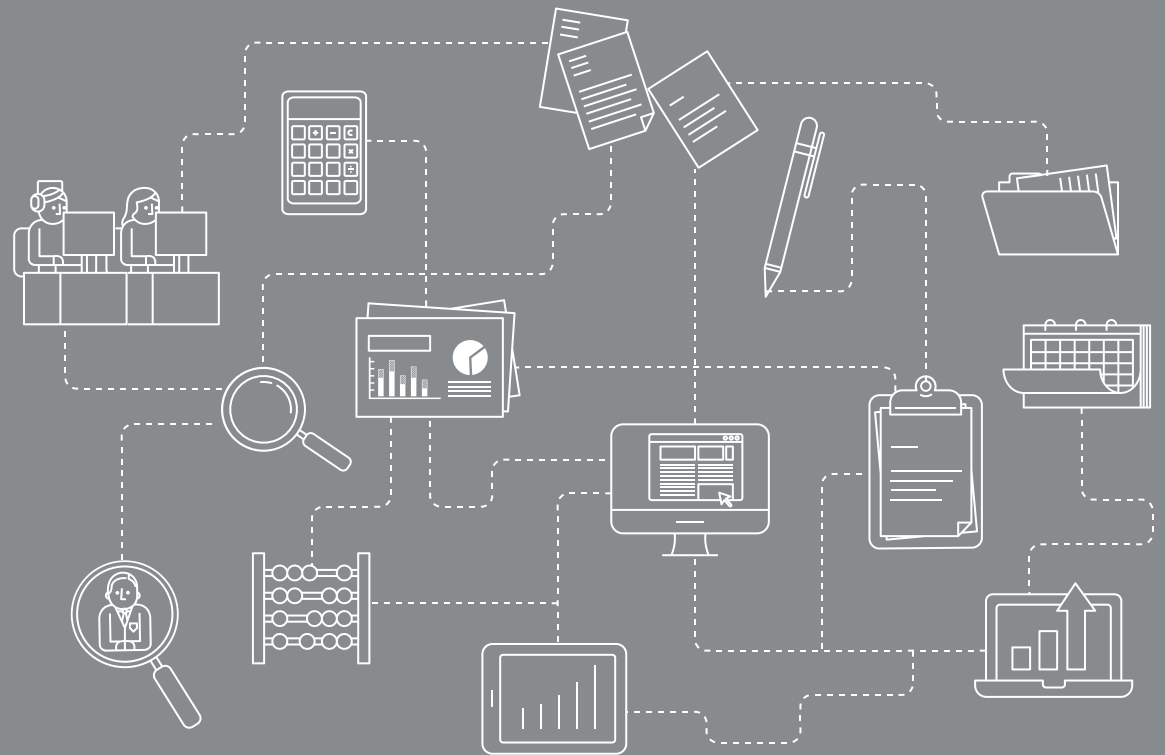
Our review confirmed that the Force conducts structured annual self-assessments against national toolkits such as the NPCC DEI Toolkit, covering strategic and tactical workstreams. These assessments inform the DEI Delivery Plan, which is updated quarterly and aligned with national priorities including the Police Race Action Plan and College of Policing guidance. Governance is maintained through the Strategic Workforce Planning Board and Tactical Workforce Planning Group. Action logs track progress across multiple DEI initiatives, including ethnicity pay gap reporting, cultural awareness training, and engagement with community groups.

Governance Structure

The Strategic Workforce Planning Board is central to overseeing the delivery of the People Strategy and DEI objectives. The governance structure includes documented Terms of Reference and links to internal groups (e.g. Staff Networks, Scrutiny Panels) and external challenge mechanisms (e.g. HeForShe, Disability Confident Scheme). We confirmed from the quarterly meeting slides, September 2025, evidence strategic planning, workforce representation analysis, and updates on DEI activities. The governance framework supports multi-level engagement and ensures accountability for DEI delivery across the Force.

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as*:

High

Immediate management attention is necessary.

Medium

Timely management attention is necessary.

Low

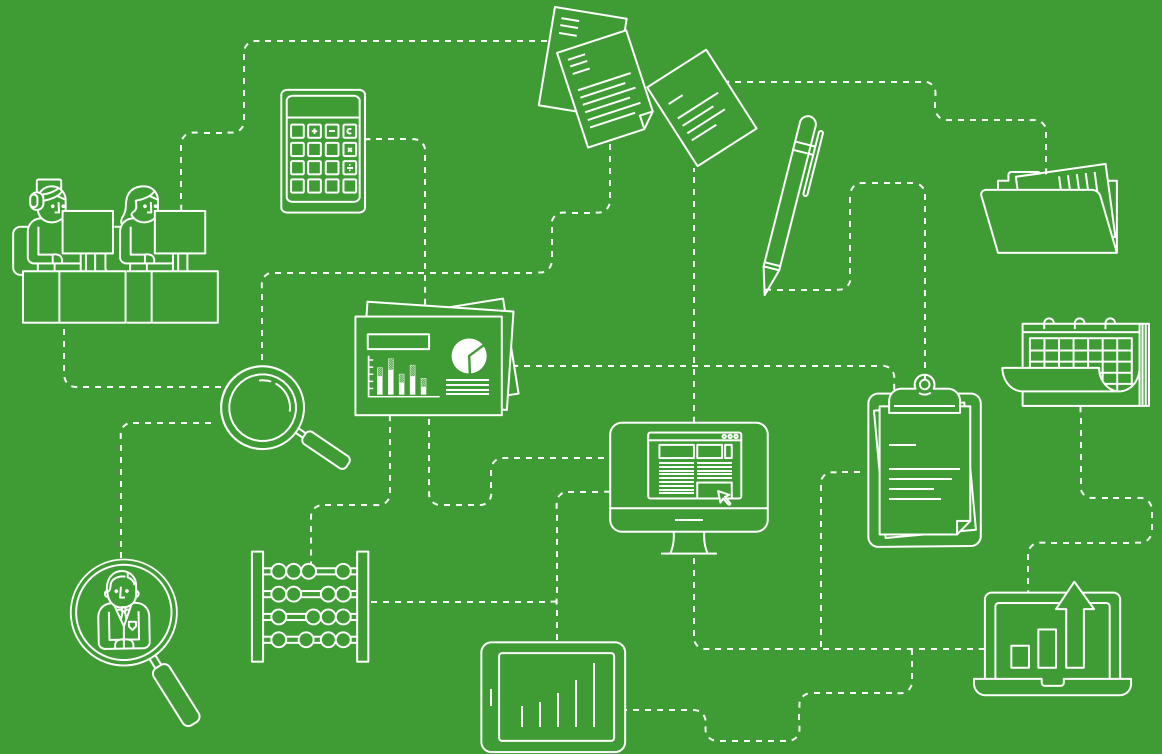
There is scope for enhancing control or improving efficiency.

As a result of our review, we have not identified any areas of weakness in the design and/or compliance with controls. Therefore, no management actions have been agreed as a result of this review.

* Refer to Appendix B for more detail

Detailed Findings and Actions

02



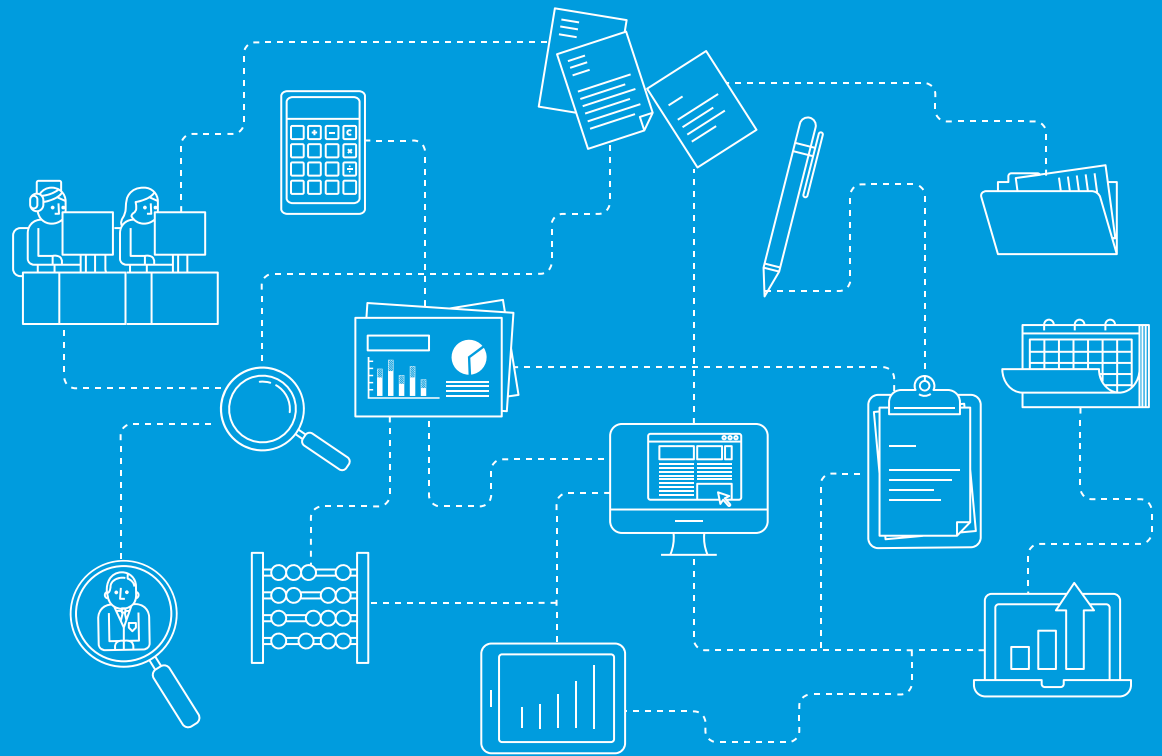
DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all audit testing undertaken.

As a result of our review, we have not identified any areas of weakness in the design and compliance with controls. Therefore, no management actions have been agreed as a result.

Appendices

03



APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Low
There is scope for enhancing control or improving efficiency.

Medium
Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.

High
Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non-compliance with controls*	Agreed actions		
			Low	Medium	High
Equality and Diversity	0 (8)	0 (8)	0	0	0
Total			0	0	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: INTERNAL AUDIT ASSIGNMENT OPINIONS



Minimal Assurance

Taking account of the issues identified, the board cannot take assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Urgent action is needed to strengthen the control framework to manage the identified risk(s).



Reasonable Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).



Partial Assurance

Taking account of the issues identified, the board can take partial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk(s).



Substantial Assurance

Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

APPENDIX C: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following objective:

Objective of the risk under review

All public sector organisations have a legal duty for Equality, Diversity and Inclusion known as the Public Sector Equality Duty (PSED), which came into force in 2011. The Equality Act 2010 protects people from discrimination and covers nine protected characteristics: age, disability, sex, gender reassignment, race, marriage and civil partnership, pregnancy and maternity, religion or belief, and sexual orientation. Our review was to ensure the organisation has an appropriate framework in place to monitor the implementation of the NPCC's Workforce Representation – Attraction, Recruitment, Progression and Retention toolkit.

When planning the audit, the following were agreed:

Areas for consideration:

- Equality and diversity objectives have been established as organisational priorities and reflected in Force strategies, policies and operational plans.
- Our audit will focus on themes from the People Strategy around promoting a culture of workforce representation, namely:
 - We will improve workforce representation and progression, preventing discrimination & disproportionality.
 - We will achieve Disability Confidence level 3 in 23/24 & Armed Forces Gold in 24/25 to support our resource pipeline.
 - We will embed workforce representation into ways of working, leadership development & cultural competency.
 - We will embed workforce representation risk assessment into the Force.
 - We will develop & deliver an inclusion & cultural events plan to expand inclusion opportunities & celebrate diversity in the Force.
- We will review the process the Force has undertaken to deliver its People Strategy and align it against national guidance and tools (such as the Police Race Action Plan and NPCC Toolkit) and develop internal action plans.
- The Governance structure to monitor, review and challenge the Force on progress including external challenge.

Limitations to the scope of the audit assignment:

- We will not confirm that policies and procedures comply with legislation, only that the Force is complying with its policies and procedures.
- We will not include complaints or grievances.
- We will not provide an opinion on the culture of the organisation, perceived or actual.
- Testing will be on a sample basis only.
- The results of our work are reliant on the quality and completeness of the information provided to us.
- Our work will not provide an absolute assurance that material errors, loss or fraud do not exist.

Please note that the full scope of the assignment can only be completed within the agreed budget if all the requested information is made available at the start of our fieldwork, and the necessary key staff are available to assist the internal audit team. If the requested information and staff are not available, we may have to reduce the scope of our work and/or increase the assignment budget. If this is necessary, we will agree this with the client sponsor during the assignment.

To minimise the risk of data loss and to ensure data security of the information provided, we remind you that we only require the specific information requested. In instances where excess information is provided, this will be deleted, and the client sponsor will be informed.

Debrief held 15 October 2025
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We have no responsibility to update this report for events and circumstances occurring after the date of this report.

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