



HMICFRS Consultation: Proposed policing inspection programme and framework 2025–29

The Traveller Movement Submission

25th October 2024

About the Traveller Movement

The Traveller Movement is a registered UK charity promoting inclusion and community engagement with Romani (Gypsies), Roma and Irish Travellers. The Traveller Movement seeks to empower and support Romani (Gypsy), Roma and Irish Traveller communities to advocate for the full implementation of their human rights.

Summary

The relationship between the police and Romani (Gypsy), Roma and Irish Traveller communities is characterised by mutual mistrust, hostility, and poor communication. In 2018 the Traveller Movement conducted a national research project which surveyed all 45 territorial police forces (conducted by FOI requests), and thirty-one in-depth qualitative interviews with police officers and community members living and working in five police force areas in England. The research looked at how police forces engage with Romani (Gypsy), Roma and Irish Traveller communities and at the relationship between police forces and these communities. The report found that of the 45 territorial police forces only two had targeted strategies and/or plans for improving relations with Romani (Gypsy), Roma and Irish Traveller communities. Police officers and community members who participated in the research described the protected ethnicities being treated as a risk factor by the police, indicating that there is an entrenched discriminatory approach to policing these communities.¹

It is important to remember that Romani (Gypsies), Roma and Irish Travellers are different and distinct ethnic groups and cultures which are all protected under the Equality Act 2010 ('the Act'). This means that public bodies have a Public Sector Equality Duty (PSED) to eliminate discrimination, advance equality and foster good relations. However, Romani (Gypsy), Roma and Irish Traveller communities still experience exceptionally poor outcomes across the criminal justice sector.

¹ The Traveller Movement, [Policing by Consent](#), (2018).



The Traveller Movement
40 Jeffrey's Road
Stockwell
London SW4 6QX

T +44 (0) 207 607 2002
F +44 (0) 207 607 2005
www.travellermovement.org.uk
info@travellermovement.org.uk



The increasingly hostile relationship between police and the communities has not been alleviated by the introduction of the Police, Crime, Sentencing and Courts Act 2022 ('the Police Act') which essentially criminalises the traditional way of life of Romani (Gypsy), Roma and Irish Traveller communities.

Recommendations

- HMICFRS should carry out a thematic inspection on Romani (Gypsy), Roma and Irish Traveller policing focusing on community engagement, use of powers, enforcement and data collection.
- HMICFRS should carry out a thematic inspection on forces adherence to their duties under the Act and their PSED.
- Traveller Movement recommends the inclusion a measure in PEEL assessments to identify how individual police forces are improving relations with Romani (Gypsy), Roma, and Irish Traveller communities, specifically looking at shifts from response to prevention led models.

Consultation Questions

1. Do the proposed thematic inspections cover the topics that are currently of most concern to you? Which do you believe are the most important or urgent?

The Traveller Movement believes that it is imperative that HMICFRS begins to **conduct a thematic inspection on forces adherence to their duties under the Act and their PSED**. In 2022 HMICFRS² asked all police forces to conduct a short survey which looked at whether forces recognised their PSED and their understanding of how this duty relates to police criminal justice decisions. This survey found that only 24 of 42 forces have strategies, policies and actions that need to take account of the PSED. Further it found that only 22 of 42 forces have a strategy to explain, where necessary reduce, and where possible eliminate, ethnic disparities. The inspection report acknowledges that as there are no policies or guidance on the need to understand disparity within the criminal justice system. However, all forces are subject to the Act.

Data collection is an essential aspect of effective policing further to this it is essential for public bodies to collect accurate fully disaggregated ethnic data which allows both the body itself and the public to scrutinise disparities within these bodies. However, police forces are still failing to record and routinely publish data on ethnicity. In 2022 HMICFRS in their response to Tees Valleys super-complaint concluded that 'police-recorded data was too patchy, poor-quality and inconsistent... to be able to compare the experiences of people of different ethnicities.'³ This

² HM Inspectorate of Constabulary and Fire & Rescue Services, [Race and policing: An inspection of race disparity in police criminal justice decision-making](#), (2023).

³ Ibid.



critically underscores the importance of ensuring that there are comprehensive strategies and robust policies in place to assess police forces adherence to their PSED.

The Traveller Movement suggests that HMICFRS should carry out a **thematic inspection on Romani (Gypsy), Roma and Irish Traveller policing** focusing on community engagement, use of powers, enforcement and data collection. As previously stated, research conducted by the Traveller Movement indicates there is an entrenched discriminatory approach in the way Romani (Gypsy), Roma and Irish Traveller communities are policed and that forces are not upholding their PSED to these communities. The majority of those interviewed described Romani (Gypsy), Roma and Irish Traveller ethnicity being treated as a risk factor by forces illuminating the entrenched discriminatory view of these communities within policing. Within this research police respondents reported Romani (Gypsy), Roma and Irish Traveller communities being associated with crime, criminality and violence and reporting a higher police turnout to calls to incidents involving Romani (Gypsy), Roma and Irish Traveller communities. The Traveller Movement also regularly receives reports of police advising businesses (pubs, restaurants and hotels) to deny access to Romani (Gypsies), Roma and Irish Travellers.

This research also highlighted the prevalence of discriminatory and racist language used by police officers to describe Romani (Gypsy), Roma and Irish Traveller people. This language often goes unchallenged; police forces are failing to eliminate unlawful discrimination and instead are perpetuating it. With some perceptions within the police regarding the Romani (Gypsy), Roma, and Irish Traveller communities are viewed as criminogenic, leading to discriminatory police practices that automatically treat community members as suspects. This suggests that discrimination is being perpetuated by certain aspects of police practice.

This affects the levels of Romani (Gypsy), Roma, and Irish Traveller people who are willing to report crimes and a wider issue of community members being seen as perpetrators rather than victims of crime.⁴ The Realities Checked Study⁵ found that 11% of Romani (Gypsies) and Irish Travellers had been a victim of a racially motivated hate crime in the last 12 months. This is more than 10 times the victimisation rate of Asian and Black people. However, because of the poor relationship between the communities and the police these crimes are rarely reported. Further perceptions of the police are often as Romani (Gypsy), Roma and Irish Traveller communities being perpetrators rather than victims of crime. The study found that the communities are more likely to be victims of all times of crime than any other ethnic group. 46% of Gypsies and Travellers said they had been a victim of crime in the last 12 months. This is more than double the rates of victimisation of other minority ethnic groups.⁶

Further to this the Traveller Movement has concerns that dedicated Romani (Gypsy), Roma and Irish Traveller community engagement roles exist (i.e. Gypsy Traveller Liaison Officers) are

⁴ Realities Checked: [Gypsies and Traveller Experiences of Crime and Justice](#) (2024).

⁵ Realities Checked: [Victimization Policy Brief](#) (2024).

⁶ Realities Checked: [Victimization Policy Brief](#) (2024).



innately discriminatory. These roles which typically focus on enforcement rather than meaningful community engagement reinforce discriminatory stereotypes of Romani (Gypsy), Roma and Irish Traveller communities almost suggesting they need 'extra' policing. Respondents expressed concerns that these dedicated teams further isolate the communities segregating them from mainstream police practice and labelling them a "difficult group". They also highlighted the fact that other ethnic minority groups don't have dedicated teams.

2. Do you agree with the proposed changes to the PEEL assessment framework?

The Traveller Movement welcomes the proposed changes to the PEEL assessment framework however, the Traveller Movement recommends the **inclusion a measure in PEEL assessments to identify how individual police forces are improving relations with Romani (Gypsy), Roma, and Irish Traveller communities**, specifically looking at shifts from response to prevention led models.

Many police forces currently emphasize enforcement over engagement and response over prevention regarding Romani (Gypsy), Roma, and Irish Traveller communities. This approach has led to ineffective, inefficient, and often illegitimate policing. Recent evidence from the Realities Checked Study⁷ found that 40% of respondents reported having very little trust in the police, while another 39% stated they did not trust them at all. Only 29% felt that the police in their local area would treat them with respect if they reached out for any reason—this figure is three times lower than the general population, where 87% believed they would be treated respectfully (ONS 2020). The study also examined the use of police powers and perceptions of disparity, revealing that 39% of participants felt they had been unfairly stopped, questioned, physically threatened, or abused by the police, with 82% attributing these experiences to their ancestry, race, or physical appearance.

This relationship of enforcement over engagement can be seen in the Police and Crime Plans of Police & Crime Commissioners which overwhelmingly focus on 'tackling unauthorised encampment' and characterise these encampments as anti-social behaviour. A number of these plans refer to these communities broadly as 'travelling communities', a term which can obscure the specific ethnic and cultural identities of Romani (Gypsy), Roma, and Irish Traveller people. HMICFRS should consider in their inspections whether these powers are being utilised within forces and if the use of these powers align with equality duties and human rights obligations.

The Traveller Movement believes that HMICFRS should consider the policing of Romani (Gypsy), Roma, and Irish Traveller communities during its inspections.

3. Are there any significant new or emerging problems in policing that we should consider when we inspect individual police forces?

⁷ Realities Checked: [Gypsies and Traveller Experiences of Crime and Justice](#) (2024).



The introduction of the Police Act which has granted the police the authority to ban Romani (Gypsies) and Travellers from an area for up to 12 months, an increase from the previous three months. Additionally, the Police Act included powers to fine, arrest, imprison, and seize the homes of Romani (Gypsies) and Travellers in roadside camps. A High Court judge has found parts of this legislation to be incompatible with human rights law as the powers are capable of causing a significant intrusion on the lives of Romani (Gypsies) and Travellers.

The expansion of these powers alongside the already existing culture of enforcement over engagement is likely to compound existing issues of mistrust and hostility. The Traveller Movement believes the use of these powers and the disparities associated with them should be closely monitored and should be considered during HMICFRS inspections.

The use of predictive policing methods associated with AI and computer programmes is a significant concern for any organisation working with ethnic minorities. The use of Automatic Number Plate Recording (ANPR) for example has always been a concern for the Traveller Movement, but the inconsistent collection of ethnic data relating to vehicle stops makes it very difficult to identify disparities in the use of this power and in ANPR.

The two types of predictive policing which are known are predictive mapping programs and individual risk assessment programs. The predictive programs lack neutrality. They are developed by people and depend on existing police data, which means they reflect and reinforce patterns of discrimination within policing practices. Particularly in areas which already experience over policing and heavy handed policing, such as sites and stopping sites.

It is imperative that HMICFRS monitor the use of these tools and encourage forces to be fully transparent into how these tools are used and to monitor their use so the disparities they perpetuate are closely monitored.