

# Devon & Cornwall Police Equality Impact Assessment



**Devon & Cornwall Police**  
Building safer communities together

For: Projects / Functions / Policy / Working Practice / Strategy

<b>Name of Project / Function / Policy Title &amp; Number / Working Practice / Strategy</b>		<b>PEO Review</b>	
<b>Name &amp; Contact Details of Assessor / Author</b>		<b>Sandy Brooks 22191/22436</b>	
<b>Name of Project / Function Lead / Policy Owner (Department)</b>		<b>PEO Review ACC Netherton</b>	
<b>Start Date</b>		<b>20 December 2013</b>	
<b>End Date</b>		<b>31 October 2014</b>	
<b>Version</b>		<b>1.2.2</b>	
<b>Associated Documents / Working Practices</b>		<b>Terms of Reference and Business Case</b>	
<b>Date Policy submitted to Policy Admin (Policy only)</b>	<b>N/A</b>	<b>Check completed &amp; Registered</b>	<b>N/A</b>
<p><b>This EIA is being undertaken because it is:</b></p> <p>Part of a project proposal submission <span style="float: right;">Yes</span></p> <p>A result of organisational change <span style="float: right;">Yes</span></p> <p>A review of an existing project / function / policy <span style="float: right;">Yes</span></p> <p>Other (please state reason):</p>			

## Guidance Notes

### **The purpose of conducting an Equality Impact Assessment on functions, working practice, strategy or policy is to ensure that when delivering them the activities of the Force**

- Do not have an unjustified and adverse impact on policing and communities of Devon, Cornwall and Isles of Scilly particularly those from the protected characteristics.
- Do not have an unjustified and adverse impact on its staff, particularly those from the protected characteristics.
- That we acknowledge the relevance to the general equality duties
- That we acknowledge any mitigation taken to reduce the impacts of any activity

An Equality Impact Assessment (EIA) is simply a tool or process that enables us as an organisation to check out how an existing service or policy or a new service or policy affects groups of people covered by equalities legislation and our Equality and Diversity Strategy.

It allows us to look at evidence or consult as to whether the service or policy is discriminating (actual or perceived to be) against a particular group of people.

We can then change the policy or service if it has an adverse effect on people or indeed highlight it as good practice if it is having a beneficial effect.

This process assists in evidenceing that any new or revised policy, strategy, function or working practice together with its associated working practices complies with our obligations, some of which are statutory, in respect of:

- Reducing Bureaucracy
- Freedom of Information
- Data Protection
- Management of Police Information
- Health & Safety/Environmental
- Equality and Human Rights Impact
- Equality Impact Assessment

Further guidance in respect of Policy Review can be found in the Force Policy Handbook and assessment guidance notes available on the Force Policy Admin Website or by contacting the Force Policy Admin Team on 22826 / 22336 / 22557

If you are unsure about the answer to any of the questions in the EIA please contact Equality & Diversity Department [\*\*diversityhq@devonandcornwall.pnn.police.uk\*\*](mailto:diversityhq@devonandcornwall.pnn.police.uk) for further support.

## Step 1 Equality Impact Initial Screening

'Project' includes Policy, Function, Working practice & Strategy.

Significance and Impact	
Does the project affect employees, service users, partner organisations or the wider police service?	Yes
Is it a major project with a significant effect on how functions are delivered?	Yes
Does it involve a significant commitment of resources?	Yes
Does it relate to an area where there are known inequalities? (e.g. gender pay gap, hate crime, accessibility)	Yes
If the answer to any of these questions is 'Yes' then following completion of the <b>Relevance section</b> continue with <b>Step 2 scoping, a full impact assessment will be required.</b>	

Relevance
<p><b>Outline the relevance of the project to the general equality duties. Consider each of the aims of the general duties and explain which aspects of the project are relevant to which duties.</b></p> <p>The three aims of the General Duty are:</p> <ul style="list-style-type: none"> <li>To eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010</li> <li>To advance equality of opportunity between people from different groups</li> <li>To foster good relations between people from different groups.</li> </ul> <p>Set out the <u>positive</u> and <u>negative</u> impacts consider <u>internal</u> and <u>external</u> impacts</p> <p>This review is being undertaken to deliver essential cashable efficiency savings as a result of the Comprehensive Spending Review. It provides an opportunity to optimise fixed site public accessibility to our services and the resources that provide these services whilst contributing to the force's commitment to make financial savings and sustaining internal and external trust and confidence. Due regard will be given in the decision making process to ensure any changes or any</p>

impact does not bring about any breach of the Equality Act 2010 and that it also supports Employment Law requirements. This will be done through planned and careful consultation with all staff, HR, Legal Department, Trades Unions and Corporate Equality & Diversity Department. Where anyone raises a concern as to the potential for discrimination, harassment or victimisation or, indeed, any other action that would suggest the force has not given appropriate due regard to its legal obligations, this will be robustly revisited and further legal advice sought if necessary.

It is recognised that any changes to the provision of front counter services will have the potential to impact both negatively and positively on all staff and that some will find the changes difficult. The force will work with these individuals to do all that it reasonable can be expected to do to help individuals through this time of change. At the same time, the force will give due regard as to the make-up of the staffing within the front offices and consider any impact that might occur due to an individual's particular protected characteristic e.g. disability, gender etc and the ratio of full to part time workers and in making change will incorporate the necessary due regard into the decision making processes. Any changes to shift working and operating hours will be considered in accordance with Health and Safety and consultation with the Trades Unions.

Accessibility for those who interact with us will be duly considered and opportunities to deliver our services through inclusive means will be explored wherever possible. Any reduction in the number of operational sites will be evaluated so an understanding on the impact of potential closures will have on our communities and those who access our services will have.

Opportunities currently exist for those with protected characteristics such as disability, language; race can access and communicate with the police through the front counter services with aides such as a Hearing Loop, use of Language Line, Braille cards and signing blocks. Any reduction in the number of front offices will diminish the opportunity for people with protected characteristics to access the police services through the front office.

**Has the screening identified the project as having relevance to any of the following protected characteristics?**

This is initial assessment of potential impacts that can be explored further as part of the EIA

Age	Yes	Disability	Yes	Sexual Orientation	No
Race	Yes	Sex	Yes	Religion or Belief	Yes
Gender reassignment	No	Pregnancy & Maternity	No	Marriage or Civil Partnership Status	No

**Does the project have the potential to impact on an individual's rights as set out in the European Convention of Human Rights?**

This is initial assessment of potential impacts that can be explored further as part of the EIA

Article 2 Right to life	No
Article 3 Prohibition of torture, humiliation & degrading treatment	No
Article 4 Prohibition of slavery and forced labour	No
Article 5 Right to liberty and security	Yes
Article 6 Right to a fair trial	No
Article 7 No punishment without law	No
Article 8 Right to respect for private and family life	Yes
Article 9 Freedom of thought, conscience and religion	No
Article 10 Freedom of expression	No
Article 11 Freedom of assembly	No
Article 12 Right to marry	No
Article 14 Prohibition of discrimination	Yes
Article 1 of *Protocol 1 Protection of property	Yes

**Include a statement explaining what the specific legal basis is for any potential interference within the Human Rights Act?**

**Explain in full (including whether the interference is justifiable, necessary and proportionate and why)**

The following Human Rights impacts are identified at an initial screening stage, the likely level of impact and intended mitigation or action to remove the impact will need exploring further in the full EIA, when additional impacts may well also be identified.

Article 5 – Front counter services provide a bail reporting function there may be some impact if there is a reduction in the provision on people who are bailed with reporting conditions. In addition people on the sexual offences register are required to register at police stations.

Article 8 & Article 14 – Impact on the private lives of the people we employ with

<p>regard to due regard on social economic participation in life including but not limited to issues relating to flexible working, reasonable adjustments and disability.</p> <p>Article 1 of protocol 1 Protection of property – Front counter services provide a public facing function with regard to the handling of lost, found, recovered property on behalf of the organisation and changes to the opening times / locations and accessibility of this service may impact n the provision of services with regard to property and its safety and security.</p>	
<p><b>Where it is considered that a project has no relevance to the general equality duties or equality groups, this should be recorded here with the reasons and advice.</b></p>	
<p>n/a</p>	
<p><b>Proceed to full EIA</b></p>	<p>Yes</p>
<p><b>Approved by Equality &amp; Diversity Department</b></p>	<p>Date: 6/5/14 Name: Simon Hill</p>
<p>E&amp;D comments:</p> <p>This initial screening document has been prepared to accompany the papers to COG on 12/5/14. It is anticipated that this will require a full EIA to be carried out and that some of the consultation that is already underway will help inform the full EIA</p>	
<p><b>Approved by Project Lead</b></p>	<p>Date: 09/05/14 Name: T/Ch Supt E Webber</p>

## Step 2 Scoping of the Equality Impact Assessment

<p><b>What are the main aims, purpose and outcomes of the project? What do you hope to achieve by it? Who will benefit? Who may be impacted by it?</b></p>
<p>This review is being undertaken to (in no particular order)</p> <ul style="list-style-type: none"> <li>• Deliver essential cashable savings as a result of the Comprehensive Spending Review.</li> <li>• Provide an opportunity to optimise fixed site public accessibility to our services and the resources that provide these services</li> <li>• Adjust our services to be more representative of a 21<sup>st</sup> century public who rely more on technology and telephony than in the 20<sup>th</sup> century</li> <li>• Contribute to the force’s commitment to make financial savings and</li> </ul>

sustaining internal and external trust and confidence.

It is anticipated that there will be opportunities for benefits and impacts for both employees and the public that will be explored further in the full EIA

**What aspects of the project are particularly relevant to equality?**

Flexible / Restricted working / Disability

Age profile of employees in roles

Age profiles of service users

Face to face contact with service, in respect of age, race in respect of language and disability, particularly learning disability and sensory disability where previous research suggests that face to face contact provides a better experience

All of these and others will require additional exploration as part of the full EIA

**What evidence is already available that will help in the development of both the project and the EIA?**

Your EIA must include relevant equality monitoring data. This could be Force or national performance data, or data from external sources such as the Home Office, partner organisations, or the Office for National Statistics. If data is not referenced or a link is not provided to the source, your EIA will not be signed off by the Equality & Diversity Department.

If there is no equality monitoring data available, you need to set out in the box below how you will capture this information in the future.

Information needed to support EIA & Impact for Protected groups  
(Include data in relation to Religion & Belief: Sexual Orientation; Gender Reassignment and Marriage / civil partnership status if this information is relevant to the subject and available) These tables are set up to assist in including the data relating to the staff / officers who may be impacted compared to the rest of the force. Similar data is required to show the numbers of people who may be impacted by a project in the wider community.

**Headcount**

	Male	Female	Disabled	Non-Disabled	Pregnancy / Maternity	Part Time Workers
Affected Group	37	31	5	63	0	23
Police Staff	968	1261	144	2085	26	524
Police Officers	2226	936	248	2914	40	322
Force (Officers & Staff)	3194	2197	392	4999	66	846

Age	25 & Under	26-35	36-45	46-55	56-65	Over 65
Affected Group	1	6	6	32	23	0
Police Staff	131	446	582	667	388	15
Police Officers	33	753	1304	1021	51	0
Force (Officers & Staff)	164	1199	1886	1688	439	15

Ethnicity	White	BME	Other (Not Stated/Prefer not to say)
Affected Group	53	2	13
Police Staff	1853	24	352
Police Officers	2644	39	479
Force (Officers & Staff)	4497	63	831

**Full Time Equivalent (FTE)**

	Male	Female	Disabled	Non-Disabled	Pregnancy / Maternity	Part Time Workers
Affected Group	32.4	26.4	5.0	53.8	0.0	13.8
Police Staff	936.1	1114.7	133.9	1916.9	24.1	345.8
Police Officers	2220.4	854.6	241.4	2833.6	36.1	235.0
Force (Officers & Staff)	3156.5	1969.3	375.3	4750.5	60.2	580.8

Age	25 & Under	26-35	36-45	46-55	56-65	Over 65
Affected Group	0.7	4.3	5.6	28.9	19.3	0.0
Police Staff	128.1	411.1	521.3	625.3	353.7	11.3
Police Officers	33.0	723.0	1262.1	1005.9	51.0	0.0
Force (Officers & Staff)	161.1	1134.1	1783.4	1631.2	404.7	11.3



Ethnicity	White	BME	Other (Not Stated/Prefer not to say)
Affected Group	46.5	2.0	8.3
Police Staff	1692.4	23.0	335.4
Police Officers	2567.6	38.7	468.7
Force (Officers & Staff)	4260	61.7	804.1

Additional data and information has been reviewed to ensure that inequality has been breached.

Staffing Profile post selection process and entering into 90 day notice period on 1<sup>st</sup> August 2014

All Stations	Male 21	Female 14
Supervisors	Male 2	Female 1
All Stations Part time	Male 5	Female 4

VR and Deferred VR data is in the Risk Assessment Spreadsheet as part of the initial VR and deferred VR process. As a result of the interview process and those who were unsuccessful and did not secure a post the following data applies

8 accepted VR (who had applied for VR but were not successful prior to interview)  
 5 Males, 3 Females  
 5 would have been made compulsory redundant 3 Males 2 Females

During the 90 day at risk stage up to 31<sup>st</sup> October of the 5 at risk of Compulsory Redundancy, 1 found a post outside of the organisation and resigned (male). 2 were successfully redeployed to other posts in force (both male) (1 in Cornwall, 1 in Devon). 1 was redeployed to another PEO role following a part time application from another PEO (female). 1 was offered two redeployment posts but declined them both and has now left on CR following an appeal of the process (not upheld) (female).  
 Of the 5 at risk of CR, 4 were part time and 1 full time.

The interview process was determined by a top down interview score and the individuals preference of location (as determined by them in a preference exercise earlier in the process). The slotting was overseen throughout by TU representatives present, and the process was previously agreed during the 45 day formal consultation process with the TU's. There was one appeal against the outcome and process (female) which was independently reviewed (C/Supt) but the appeal was not upheld.

**Do you require further information to gauge the probability and / or extent of any adverse impact on protected groups?**

**YES**

If **No**, please go onto the next section.

If **Yes**, please explain how you will fill any evidence gaps. Be specific – outline how you will collate evidence, the time frames and responsibilities for doing so.

Results of consultation & demographic data both internal and external;

Consultation was with key stakeholders, external and internal, as outlined in the stakeholder plan. External stakeholders included liaison with the Courts and letters to Chief Executives, Mayors, MPs, LCJB, Prisons, and other business leaders inviting discussion and exploration of opportunities to deliver business in different ways. Communication with the 3 x Partnership Superintendents to move forward with responses from those letters. There was also a media strategy and press releases at certain key points.

Information and results from the recent public consultation relating to the future location of the Exeter Front Office was considered and factored into the final business plan. Extensive public consultation was undertaken as part of the 2010/11 SEO Review and an early decision was taken not to conduct further public consultation primarily because the demographics of the force area have not altered since then. The data from the initial review was considered and factored into the final business case.

Full consultation with the public's elected representative, the Police and Crime Commissioner was held along with members of his office. Feedback was received and support given for the final business model.

There have been no significant changes to the demographic and infrastructure of the force areas since 2010/11, even allowing for the extensive development of the new housing area outside of Exeter. No new major arterial routes have been built or significant industry developed in the region to alter overall demographics.

In spite of these slight population increase we know from the data that footfall into front offices has fallen between 15% and 40% in the last 3 years.

Ofcom data states that in 2013 94% of the population own and use a mobile phone with 75% of people also having broadband. A force survey in 2013 showed that almost 85% of people prefer to contact the police by telephone, a growth of almost 25% since 2010 compared to less than 10% who would attend a police station.

### **Which communities and groups will need to be consulted or involved in the development of the project?**

Use of the force website increased by 63% between 2012 and 2013. A growth in the use of Facebook and Twitter accounts is accessing younger members of society and predicted to grow further.

Equality and Diversity representatives have been consulted to ensure that the needs of all communities are understood and considered as part of the review. In 2011 the Chair of the Disability Advisory Group was visited and did not object to the proposals and a few suggestions to ensure accessibility for people with disabilities were then considered (such as the height of the wallphones and SMS texting) and implemented. The blue wallphones non-emergency 101 button will be upgraded to a 'priority status' within the Force Enquiry Centre. The Trades Unions and Employee Relations have been consulted and engaged with throughout the lifetime of the review.

## Step 3 Equality Analysis

### Assessing the impact for different groups

#### Please provide details

- *What are the main findings from your involvement and consultation and do they demonstrate problems that need to be addressed?*

The public have demonstrated a reducing requirement to visit a front office as a preferred method of engaging with the police. Technology provides other methods which are growing in use and popularity. Reasons to attend a police stations are also diminishing with more tasks and services now available on line, through the post or no longer required. The force has implemented an appointments system so that those who are unable to visit a police station can be visited at their home or place of work for non-urgent police matters.

- *Could the project affect different groups disproportionately?*

If attendance at a front office is preferred or required then some people may be required to travel further distances with more front offices closing. As a result of the previous review in 2010 where 36 front offices closed, the anticipated increase in footfall at those front offices that remained was not seen. In fact, demand has continued to fall between 15% to 40% with many PEOs and front offices showing low demand This was supported by the footfall survey conducted over a two week period in March 2014.

The increased distance to travel could affect those on limited income or without a means of transport who rely on public transport. A consideration of the Review was the location and accessibility of the remaining front office locations, and all are within the boundaries of cities or towns, or on major arterial routes and provide the best access available within the control of the police service.

- *Is there evidence of higher or lower participation, or uptake by different groups?*

Historically engagement and contact with the police and reporting of crimes and incidents has been low – only 5.3% of front office work is the public reporting crime, incidents and intelligence from all groups. We know this is particularly from the LGBT community, those living with learning disabilities and those from the deaf and hard of hearing communities. There are no intended changes to the working practices, tasks and purpose of PEOs so there should not be any discernable change in the participation from different groups.

- *Could the project outcomes differ for different protected groups?*

The outcome of the review may differ for individuals, dependent on their own personal circumstances, ie access to public transport, use of own vehicle, access to alternative means of communications but as a protected group, no one characteristic should be affected differently. Front Office provision remains unchanged, with the exception of being provided in fewer locations. We are able to offer appointments for anyone who needs to see a police officer or PCSO about a policing matter. Those living with disability, learning or sensory

conditions and those whose first language is not English, suggest, through research that face to face contact provides a better experience for those living with disability. Mystery shopping exercised delivered in partnership with Equality and Diversity are planned for late November to test the service we are providing.

- *Is there any evidence that any part of the proposed project could discriminate unlawfully, directly or indirectly, against people from some protected groups?*

There is no evidence to suggest so.

- *Are there are other changes / initiatives planned that may need to be considered alongside this project? If so you need to consider the cumulative effect of these changes for different groups.*

The Policing the Demand Project which incorporates the Contact Strategy and Deployment Strategy will need to be considered as they develop to ensure any cumulative effect is recognised and understood and where necessary mitigated. The function of the Partnership Superintendents to deliver services differently in the future will also need to consider issues such as accessibility and inclusivity.

An upgrade to the force website will provide improved accessibility to host more on-line, self serve opportunities in the Autumn of 2014.

The local Inspectors have developed detailed engagement plans which are on the force website. Whilst the purpose of the front offices is not for 'engagement' per se it is recognised that the closure of a further 12 front offices could be seen as 'withdrawing from communities.' The engagement plans ensure our officers and staff will continue to go out into communities and are visible and accessible.

- *Do the project proposals include lawful positive action or other methods to address particular needs that should be retained?*

No

- *Do the project proposals identify potential opportunities to promote equality and ensure equitable outcomes for different communities and groups?*

A review of the FAQs on the Force website to ensured information and accessibility is equitable. A review to ensure that stations' signage, accessibility, lighting and corporate messages in a standard format is underway to coincide with the conclusion of the review.

## Assessing the impact for different groups

**What can you do to maximise opportunities to further promote equality and ensure equitable outcomes for different communities and groups?**

**Please provide details: ensure that our services are accessible through appropriate and preferred means for members of the public from a protected group. The PEO service is not changing, it's being rationalised to ensure we can maintain visible and front line services within the current and future financial constraints**

**What is the outcome of the Equality Impact Assessment?  
(Choose ONE option)**

No major change – the EIA demonstrates that the project plan is robust. The evidence shows no potential for discrimination and opportunities to promote equality have been identified and implemented.	Yes
Adjust the project proposals plan to remove barriers or to better promote equality.	No
Continue the project despite potential for adverse impact or missed opportunities to promote equality.	No
The EIA identified actual or potential unlawful discrimination.	No
Changes have been made to the project to remove any unlawful discrimination.	No
The proposals are deemed 'business critical'. Legal advice has been sought and objective justification for the proposals are attached.	No

## Action Plans

Please set out details of Action Plans that will be carried out to reduce the adverse impacts that have been identified during the assessment.

Action	Owner	Due Date	Outcome
<b>Issues and Actions outlined in supporting EIA Risk Assessment Spreadsheet.</b>			

## Step 4 Monitoring, Evaluation & Review

### Monitoring and Review

**Please provide details of how the actual impact of the project will be monitored?**

**When will this EIA be reviewed?**

(If not within a year please provide reasons)

Date: November 2015

## Step 5 Approval & Publication

**Approved by Equality & Diversity Department**

Date: 3<sup>rd</sup> and 6<sup>th</sup> November 2014

Name: Simon Hill

**Approved by Project Lead / SRO**

Date: T/Ch Supt Emma Webber/ ACC Paul Netherton

## Step 6 Monitoring & Reviewing the Action Plan

**Review of EIA - Update / Observations / Changes**

**Please provide details:**

**Approved by Equality & Diversity Department**

Name:

Date:

**Approved by Project Lead**

Name:

Date:

**Date of Next Review**

(If no further review required please provide reasons)

Date:

## Step 7 Version Control

Version	Date	Details of the version
1.1	6/5/14	Initial Screening completed for presentation to COG 8/5/14
1.2	27/06/14	Draft Full EIA
1.2.1	03/11/14	Revised Draft following end of project
1.2.2	06/11/14	Final Copy