

**PSNI
Screening Report**

August 2005

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1. Introduction

As a requirement of Section 75 of the Northern Ireland Act, 1998 (Section 75) the Police Service for Northern Ireland (PSNI) has completed a screening of all existing policies to assess their suitability or not for Equality Impact Assessment (EQIA). As the result of a meeting with the Equality Commission in June 2004 a strategic review of police functions was implemented. Emanating from that review a policy framework of 48 policy areas was identified into which existing policies were placed. This categorised twenty-two policy areas associated with core policing aims and the seven principles, which underpin the delivery of core policing and twenty-six policy areas associated with supporting core functions. A screening process was established and the departments responsible for each policy area assessed them. A Screening Report and a consultation document were subsequently devised for distribution.

A triangulation of consultation processes was then employed to gauge opinion of organisations, groups and individuals who represent the groups identified under Section 75. The three methods employed were:

- Written consultation - Distribution of the consultation document to a large sample of relevant organisations etc.
- Meetings - A series of meetings with interested organisations/individuals.
- Focus groups – A series of discussions with a number of members of Section 75 groups.

The attached report reflects the findings and analysis of those consultations.

2. Aim

This report is aimed at ascertaining, after taking account of the consultation processes, if the findings as outlined in the Screening Report are acceptable.

3. Consultation Findings

The rationale for selecting policies for EQIA is based on the potential for unjustifiable negative differential impact. The criteria for selection of policies along with rationales are set out in the Consultation Document provided at Appendix 1 of the attached report. The responses and

findings from the three consultation processes employed to gauge opinion and obtain feedback are set against the three sets of policy areas identified by the internal screening as:

- **Policy areas identified as being in need of an EQIA**
- **Policy areas identified as not requiring an EQIA**
- **Policy areas in which further information is sought**

In addition questions were asked about the timetable established for identified EQIAs and the formatting of policies into policy areas. The summary in Section 5 of the report sets out the general findings from all three consultation methodologies. When applied to the selection of policy areas and the three groups explained above the following can be established.

3.1 Format of Policies into Strategic Policy Areas

There was limited reference by respondents to the categorising of policies into the distinct policy areas. One proposal was that all policies should have been provided in the consultation process and another suggestion was that they should have been listed along side the policy areas.

The need for categorising of policies into policy areas was generally accepted, as there was widespread recognition that a less strategic approach would not in itself lead to a more comprehensive equality scheme.

3.2 Policy areas identified as being in need of an EQIA

There does not appear to be any significant objection by stakeholders in relation to the policy areas identified for EQIA. Some respondents have provided additional comment, which will inform that process.

The evidence therefore supports the planned scheduling of these policy areas for EQIA.

3.3 Policy areas identified during the screening process as not requiring an EQIA

The main policy areas identified across the three consultation processes, which now need an EQIA, were - Youth Diversion and Emergency Response. The rationales provided for this selection related mainly to communication and training though a number of disability issues were identified in the written consultation. The majority of responses did not identify specific rationales pertaining to differential impacts. They listed concerns or issues, which, similar to the communication and training related rationales, could be classed as concurrent across all policies owned by the PSNI.

The evidence provided in regards to policy areas not being the subject of EQIA allows PSNI to make informed decisions about those policy areas. The areas identified by respondents from the original twenty-four are as shown at Table 1 below and recommendations as to whether a police area should be the subject of an EQIA are included (those recommended for EQIA are shaded in grey).

3.4 Policy areas identified during screening, in which further information is sought prior to a decision about the need for an EQIA.

Communication and training related rationales were associated with this group of policy areas, with policies relating to Reassuring the Public and Reducing the Fear of Crime, Crime Prevention and Training and Education all being identified as areas of concern during the consultation processes. While others from this group were highlighted the rationales offered were mostly linked to communication concerns. All the areas identified and the response to whether an EQIA should be scheduled is set out in Table 2 below.

4. EQIA Timetable

There was little in the consultation to indicate there were problems with the proposed timetable. It was suggested by one organisation that two identified policy areas in the timetable should be moved to the first year but no rationale was provided for that suggestion. The other comment

related to rescheduling the recruitment EQIA to match the decision to review the 50/50 recruitment process, which is due to take place in 2007.

Table 1 - Policy areas identified as not requiring an EQIA

Policy Area	EQIA Yes/No	Rationale
Investigating Reports of Missing Persons	No	The rationale provided for not implementing EQIA was the recognition of the diverse needs of people with disabilities and young people already within this policy area. The only reference to this policy area in the consultation process related to recognition of carers. There is nothing, which would indicate that this is not taken account of at this moment in this policy area but this can be reinforced within training. An EQIA is not recommended.
Emergency Response	Yes	The rationale provided for not implementing an EQIA is based on the lack of evidence to indicate negative impacts on Section 75 groups. The Non-Emergency Response policy area is identified as being the subject of an EQIA and call handling procedures are being examined. It is hoped that many of the concerns raised within the consultation process will be resolved through that assessment. However, the views expressed by those consulted would indicate a perceived negative differential impact by certain groups in relation to Emergency Response. The elderly in rural areas, women living on their own, women who suffer domestic violence abuse and Catholics in nationalist areas are examples. Their perceptions are based on personal experience or an experience related to them by others, which is considered real to them. To ensure such groups are not the subjects of a negative differential impact the EQIA being run in relation to Non-Emergency Response should include the Emergency Response policy area.
Youth Diversion Scheme	Yes	<p>The initial rationale for not implementing an EQIA was the broadly consistent patterns of referrals between comparable DCUs regardless of religious composition. The rationales provided by this consultation process for implementing an EQIA in this policy area relate to communication, disability issues and training. The recent review of access to PSNI premises resulted in an extensive building programme to address physical access issues. There are still, however, the issues raised by the consultation in regards to the perceived possible differential that could be experienced by youth with some form of disability and their initial contact with police. The overall policy reflects a generic approach to youth but youth with disability have various levels of disabilities, particularly learning difficulties, which may not always be obvious to officers. The possibility exists that these youth may suffer some form of negative differential impact. An EQIA would resolve this potential issue. It should be noted that an external evaluation of the overall scheme through the NIO is at present taking place.</p> <p>Anti-Social Behaviour Orders, which are generally associated with youth, were also mentioned in the consultation as an area for concern but this policy area is currently being developed by PSNI in response to an Order of Parliament which introduced ASBO's to NI.</p>

Administration and Enforcement of Social and Related Legislation	No	The policy relates to the licensing and regulation of licensed premises, registered clubs, gambling, street-trading and benevolent/charitable door-to-door and street collections. The rationale for not implementing an EQIA is based on that criterion. The one comment made by students related to the stigmatising of students has been made on the assumption that the policy area equated with the enforcement of social drinking. There is nothing to indicate that the policy area needs to be the subject of an EQIA.
Maintenance of Criminal records	No	The rationale for not implementing an EQIA in this policy area was on the basis that it is a largely administrative function and neither complaints nor anything else has indicated a negative differential impact on any groups as listed under Section 75. During consultation reference was made to the recording of Hate crime and access to information. The recording of Hate Crime is now an integral element of an established Hate Crime strategy, which should address that concern. The facility to have information accessed in suitable formats exists and is explained through many mediums. There is nothing to indicate that an EQIA is required.
Attendance Management	No	The rationale for not implementing an EQIA is based on the fact it has been amended to ensure compliance with the Disability Discrimination Act 1995 and it is an internal policy area. The concern raised during the consultation process related to the position of single parents as carers. Provision for this form of recognition is made in the organisation's present approach to Work-life Balance and Flexibility in the Workplace, its development of a generic strategy and specific strategies in this area, i.e. child-care provision. Any change or introduction of new policy will be the subject of further equality screening. An EQIA is not, therefore, recommended for consideration.
Reward and Recognition	No	The rationale for not implementing an EQIA relates to the recent Gender Action Plan which considers issues relating to recruitment, placement, promotion and transfer of women who may previously been differentially impacted on. The concerns raised in this consultation process relates to recognition of visual impairment and the skills of those from this group. The actual policy area deals with payment of staff salary and expenses to reward long service and good conduct so the issues raised do not equate with this police area. Those concerns may be best dealt with during the EQIAs scheduled in relation to Recruitment and Promotion.
Employee Health and Welfare	No	The rationale for not implementing an EQIA was based on the lack of evidence to indicate a negative differential impact. The concern raised by the consultation process again relates to recognition of 'carer' in terms of single parent role. There has been nothing to indicate that personnel in these circumstances have suffered a negative differential impact. As with Attendance Management the organisations approach to Flexibility in the Workplace and its development of a generic strategy and specifically child-care provision is and will continue to deal with this issue. An EQIA is not recommended.

Legal Advice	No	The rationale for not implementing EQIA is based on the lack of evidence to indicate a negative differential impact is occurring for any group under Section 75. The comment made in consultation to this area refers to Human Rights but no real rationale is provided as to how this would create differential impact on any group. There is nothing to indicate that an EQIA is required in this policy area.
Supplies and Procurement of Goods	No	The rationale for not implementing an EQIA was based on the EQIA already carried out by the Department of Finance and Personnel, which did not identify any differential impacts. The comment from consultation relates to equality issues around expenditure of PSNI funds. All Standard Terms & Conditions of Contract issued by PSNI Procurement Office contains specific terms making equality of opportunity a binding obligation on both parties to any Agreement. There is nothing to indicate that an EQIA is required.
Provision of Statistical Information	No	The rationale for not implementing an EQIA is on the basis that information is made available in suitable formats and there is lack of evidence to show that any group is faced with a negative differential impact. The concerns raised in the consultation process referred to the possibility of identifying new issues and communication issues around access to information by visually impaired. The Corporate Diversity Unit provides data/information in suitable formats to any person requesting it. The comment made in respect of identifying new areas for gathering statistical information did not provide any other rationale, which would indicate any specific group or groups are facing a negative differential impact. Whenever a need for gathering specific statistical information is identified the organisation will respond accordingly, i.e. Homophobic, Sectarian and Race Hate crime. There is nothing to indicate that at this moment in time an EQIA is required.
Supporting the Programme for change	No	The rationale for not implementing an EQIA relates to the limited scope this policy area has for impacting on Section 75 groups. It considers functional areas rather than social areas. During the consultation process issues surrounding disability support, awareness training, physical barriers, attitudes and contracting out of services were again identified in respect of this area and a view that an EQIA should be carried out to ensure it is happening. This policy area is the subject of monitoring by the Oversight Commissioner so the majority of the policy functions are well monitored and supervised. The Access Audit and subsequent building programme have addressed concerns in regards to physical access. Awareness training, policy review and service delivery as it affects Section 75 groups is incorporated into the business plan of the Equality and Diversity Unit. There is nothing new to indicate that an EQIA will be required in this policy area.

Provision of Support Services	No	The rationale for not implementing an EQIA in this policy area was based on the fact it deals mainly with processes for securing and managing ancillary PSNI services, which are mainly internal to the organisation. The areas for concern raised by the consultation process in this area were identical to those raised above at Supporting the Programme for Change. Again the same rationale relating to how these can be addressed can be applied to this policy area. The implementation of an EQIA is, therefore, not recommended.
Corporate Diversity	No	The rationale for not implementing an EQIA relates to the fact that this policy area is established to promote equality of opportunity and diversity both internal and external to the organisation. In the consultation process referral to this area was a generic rationale based on the need to gather enough information from all groups to ensure it is happening. There is constant consultation with all Section 75 groups and as with all public bodies the workings of the Corporate Diversity policy is overseen by the Equality Commission. Corporate Diversity have been responsible for hosting a major conference which brought together police and community representatives from all over Ireland in January 2005 and also has been instrumental in developing minority staff associations within the service. There is nothing that would indicate an EQIA is required.

Table 2 - Policy areas in which further information is sought

Policy Area	EQIA Yes/No	Rationale
Reassuring the Public and Reducing the Fear of Crime	No	Reference to this policy area was expressed across the consultation processes. Communication and access to information that would help reassure people within all groups was indicated as being a possible weakness. Physical access issues have been dealt with through the Access Audit and subsequent building programme. The organisation is continually attempting to reach all members of the community through various different mediums and inform them as to levels of crime, crime prevention and community safety but is the subject of audience intentionality and selectivity (media consumption is directed by prior motivation and media behaviour reflects prior interests and preferences). A Reassurance Policy, which is being developed and the Best Value review of patrolling will go some way to addressing concerns in this area and the diversity training strategy being developed will augment these. The policies and strategies, which may ensue, will be the subject of Equality Screening and that should resolve any issues raised in this consultation. Nothing has identified a negative differential impact an EQIA is not, therefore, considered necessary.
Personal Protection	No	Only one reference was made in regards to this policy area. That comment was a reference to a professional group as requiring protection but did not provide a rationale for believing there was a negative differential impact on any group listed under Section 75. There is nothing to indicate that an EQIA would be required in this policy area.
Crime Prevention	No	As with 'Fear of Crime' communication was a core concern in relation to this policy area. The development of a Reassurance Policy should take account of this concern. An EQIA is not felt necessary.
Administration and Enforcement of Roads Traffic Legislation	No	Only one reference was made to this policy area and related to a function area that is in the remit of Department of Environment, Roads Division. There was nothing to indicate that there is a differential impact by any group through PSNI policy. An EQIA is not considered necessary.
Investigation of Volume Crime	No	There was a reference to women in rural areas possibly being the subject of a negative differential impact due to station closures and other references were again made to issues around disability support, access and training. The consultation processes employed in relation to potential station closures and its entry into the public arena relates directly to women in rural areas and other geographical location issues. The proposed Reassurance strategy will also refer to such scenarios. The recent Access Audit completed by Estate Services has resulted in the establishment of an extensive building programme that continues to deal with physical access. The other issues are the subject of reviews or strategies, e.g. Diversity Training, Best Value review. There is nothing that would indicate that an EQIA is required in this policy area.

Human Resource Allocation	No	General comment about equality was made in relation to this policy area. Access to the opportunity of employment was referred to and the organisation's present approach to Flexibility in the Workplace and its development of a strategy in this area will deal with such issues. The mainstreaming of equality and diversity will also augment this and an EQIA is not recommended.
Training and Education	No	There were associative comments and feedback with this policy area and reference was made to it in some form across all three consultations. The possible differential impact related to the treatment of individuals by officers, across the groups. Due to lack of awareness of people's needs or of the way in which they should be approached, it was felt that many people were being dealt with inappropriately. These issues are at present being addressed within the Corporate Diversity policy area and recent developments in relation to training, PSNI/Garda joint programme and the enhanced involvement of Section 75 groups will provide a resolution to these areas of concern. An EQIA is not recommended.
Managements of Complaints, Information and Recommendations from Office of Police Ombudsman for Northern Ireland	No	While a general comment was made about the relationship between PSNI and the Ombudsman the only other comments related to communication issues for specific groups. The policy was not cited as being responsible for a differential impact but the provision of suitable communication mediums was referred to as needing addressed. There is nothing within the policy area identified as having a negative differential impact on groups so an EQIA would not need to be implemented. The communication problems raised would need to be dealt with in association with the Office of the Police Ombudsman for NI.
Management of PSNI Estate	No	Access issues were at the core of comment related to this policy area. The possibility of negative differential impact related to groups in rural areas. Again the recent and ongoing programme identified by the Access Audit will deal with physical access and the consultation processes employed in relation to potential station closures and its entry into the public arena will highlight geographic location issues. An EQIA is not recommended.
Management accounting	No	Relating to funding and procurement issues the comment does not identify or provide a rationale as to a possible differential impact on a particular groups or groups. Management accounting relates to internal fiscal management and other than ensuring equality in contracts nothing has been said that indicates specific groups or groups will face a differential impact. An EQIA is not recommended.

A reference was made with regards to the timetable being flexible, which will allow for inclusion of newly identified policies for EQIA. It is possible something may come to light after this process has been completed and an existing policy may be identified as requiring an EQIA. The organisation will respond to this according to the circumstances surrounding that occurrence.

5. Additional Information

The consultation process also provided the opportunity for respondents and participants to provide additional information. This information related to:

- A desire for more openness and transparency – Security vetting of individuals and families and use of force by police officers were cited, as examples of where this was not taking place.
- Levels of impairment or need – There is a perception that the different levels of impairment or need within groups are not recognised. This is associated with a feeling that the organisation applies a generic perspective to groups and the needs of individuals or sub-groups are only partially catered for.
- Employment – Insufficient account is taken of the skills many disability groups feel they have on equal standing to others in society, either in recruitment or promotional aspects of employment. There was also comment in relation to the lack of recognition of offenders and their rehabilitation in this area.
- Access – The physical aspects of access for many groups is still a perceived issue, with a perception that a generic approach is being applied and the various levels of impairment ignored.

These issues can be linked to the many policy areas identified by this process. The Equality and Diversity policy area has particular responsibility placed on it in relation to mainstreaming Statutory Duties and as the policy integrates into the organisational structure of PSNI, these issues are being responded to. The information provided by respondents will therefore inform that policy area but there does not appear to be anything from the consultation that identifies Section 75 groups as being the subject of an unjustifiable negative differential impact by that

policy area. The policy itself sets out to ensure none exist within existing and new PSNI policies.

6. Conclusion

The consultation process has allowed Section 75 stakeholders to examine and provide feedback on the results of their screening of existing policies process. In general it has ratified the assessment of policy areas and the decisions regarding categorising of policies into policy areas, identification of policy areas to EQIA etc. and the timetable established to EQIA selected policy areas.

In light of comments received and issues raised it is proposed to include the following additional EQIAs and reschedule the timetable accordingly.

Emergency Response – Year 2006-2007 (equates with Non-Response EQIA)

Youth Diversion – 2006-2007

The final Screening Report submitted to the Equality Commission will reflect these changes.

In the spirit of openness and transparency all policies screened should be displayed on the Sec. 75 page on PSNI website.