

# POLICE SERVICE OF NORTHERN IRELAND



## FIVE-YEAR REVIEW OF THE EFFECTIVENESS OF SECTION 75 WITHIN THE POLICE SERVICE OF NORTHERN IRELAND 2003 - 2008

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## 1. Executive Summary

Over the past 5 years the Equality Scheme has provided an essential formal framework through which we are able to consider equality implications of our policies and procedures. Through application of screening procedures and Equality Impact Assessment we have improved the policies for which we have responsibility. The improvements reflect greater involvement with the community as a result of public consultation and ongoing integration of the views expressed by equality groups in our policy development process.

This review of the Equality Scheme has given us the opportunity to review how effective our scheme has been in promoting equality of opportunity and to identify what lessons can be learnt from the first five years of implementing our duties.

### **Key Lessons learnt over the past five years**

- That timetabling of EQIA's was too ambitious. Each EQIA can take upwards of nine months to complete attempting to do three or four simultaneously has presented those charged with this responsibility some considerable difficulty
- Equality screening must happen at an earlier stage in the policy development cycle to be meaningful
- A consultation strategy needs to be formulated to engage members of the public and representative organisations in our equality work
- Policy writers require to be trained regularly due to staff movements internally
- The involvement of the Strategic Management Team SMT is essential to progress system wide changes

- A strategic approach is required to the gathering of equality monitoring data that identifies priority areas to be monitored ahead of EQIA and screening
- Equality monitoring data needs to be made freely available to policy writers in a software package that can be interrogated to drill into specific areas of the business to analyse clearly the impact of policies on all nine categories of people described under Section 75
- Closer links should be established with other Criminal Justice Agencies to cooperate in joint consultative activities
- PSNI along with our Criminal Justice partner agencies will need to work with the Causeway project team to enable information sharing of equality data to promote sector wide equity monitoring as envisaged in the Criminal Justice review 2000.

## 1.a Introduction

Section 75 and Schedule 9 of the Northern Ireland Act 1998 requires public authorities to have due regard to the need to promote equality of opportunity, and have regard to the desirability of promoting good relations. The Police Service recognises its statutory obligations under this legislation, and is fully committed to the fulfilment of these obligations, specifically in relation to:

- (i) The promotion of equality of opportunity between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; between men and women generally, between persons with a disability and persons without; between persons with dependants and persons without; and
- (ii) Good relations between persons of different religious belief, political opinion or racial group.

Public authorities are required to submit Equality Schemes to the Equality Commission for Northern Ireland and after five years have elapsed to review the effectiveness of the scheme on promoting equality and good community relations. In order to achieve our obligations we have committed the necessary resources in terms of people, time and money to ensure that the statutory duties have been complied with, so that the Equality Scheme can be implemented effectively and on time.

This commitment has ensured that effective internal arrangements have been put in place to ensure that the duties are effectively complied with and monitored. Progress made under our Equality Scheme is reviewed by the Strategic Diversity Management Board, which is chaired by the Deputy Chief Constable. This management board meets quarterly and regularly considers Section 75 issues on behalf of the organisation.

Our commitment to the promotion of equality & good community relations has been communicated to our officers and staff. Police Officers and Police Staff who work specifically on policy development have received and will continue to receive detailed Section 75 training in relation to policy screening requirements.

The Police Services Equality Scheme seeks to describe how the Service proposes to fulfil our Section 75 duties and obligations, with regard to all policies, functions and duties. It is an effective plan for mainstreaming the promotion of equality and good community within the Police Service of Northern Ireland.

### **1.b Resource Implications**

The Police Service Equality Scheme gave a clear commitment that PSNI would be *'committed to provide the necessary resources in terms of people, time and*

*money to ensure that the statutory duties are complied with, so that the Equality Scheme can be implemented effectively and on time.'*

The Police Service has in-line with our Equality Scheme commitments made available the appropriate resources in terms of PSNI personnel and financial support to enable progress to be made under the scheme. We have identified a member of staff to be our Section 75 manager and in 2008 have appointed a Police Analyst to assist with the analysis of monitoring data and to assist with writing Equality Impact Assessments.

We have made use of consultancy support during the first five years of the scheme to provide support to policy owners and writers to build up the necessary skills and knowledge internally to thoroughly mainstream the promotion of equality and good community relations.

The Police Service has reviewed our use of consultancy support and while we may from time to time identify specific areas in which we need to this expert guidance we believe for most day to day Section 75 activities we will be able to find the necessary resources from within our own cadre of Officers and Staff, this against a backdrop of decreasing numbers of staff and police officers.

PSNI have not attempted to identify training cost of implementing Section 75 but can confirm that the resources required to deliver Section 75 have been successfully bid for as part of the Equality & Diversity Units business plan and that no other work has directly suffered from the allocation of these resources.

**Table 1 - Actual costs incurred to implement Section 75 in the Police service of Northern Ireland**

<b>Year</b>	<b>Est. Staff Cost</b>	<b>Consultancy</b>	<b>Yearly Total</b>
2003/04	<b>£27,000</b>	<b>Nil</b>	<b>£27,000</b>
2004/05	<b>£28,000</b>	<b>£16,273</b>	<b>£44,273</b>
2005/06	<b>£29,000</b>	<b>£44,846</b>	<b>£73,846</b>
2006/07	<b>£30,000</b>	<b>54,077</b>	<b>£84,077</b>
2007/08	<b>£34,000</b>	<b>£45,650</b>	<b>£79,650</b>
<b>Totals</b>	<b>£148,000</b>	<b>£160,846</b>	<b>£308,846</b>

## 2. Compliance with Section 75 Duties

### 2.a Assessing Compliance

The Police Service of Northern Ireland arrangements for assessing compliance with its duties as described under Section 75 of the Northern Ireland Act 1998 are as follows:

- The PSNI will carry out an annual review of the progress made in implementing the arrangements specified by our Equality Scheme and in complying with the statutory duties.
- The PSNI has formed a Strategic Diversity Management Board whose membership comprises the PSNI Senior Management Team (SMT) chaired by the Deputy Chief Constable. This Board meets four times per year to consider the equality & Diversity issues and reviews the PSNI's compliance with our responsibilities under Section 75.
- The Police Service will listen and act in response to criticism received from the public, oversight bodies and consultees and to learn lessons as to how to improve our responsiveness in promoting equality and good community relations.
- The Police Service will monitor any complaints that it has not fulfilled its statutory obligations.
- PSNI gather information on public perception of the fairness of our service by Section 75 equality category through questions included in the NIPB Omnibus Survey.
- The Police Service will conduct a comprehensive review of this scheme within five years of its submission to the Equality Commission.

### Identified Impacts of Section 75 on the Police Service and the public

- Promotion of Equality and good community relations is central to all policy development/decisions within the police service
- There is a new culture of seeking community views in relation to how we carry out our functions here in Northern Ireland
- There is a new focus on assessment for equality impacts as evidenced by increased equality monitoring across our areas of business over the last five years
- Greater cooperation and sharing of good practice between the Agencies that make up the Criminal Justice Sector
- Greater understanding of the equality impacts of how we carry out our functions through policy screening and equality impact assessments EQIA's
- Greater opportunity for the public to get involved in the decisions that the police make
- The public have an opportunity to get involved in a range of Independent Advisory Groups organised by PSNI representing Disability, Youth forums X4, Older Persons Groups, Ethnic Origin and Sexual Orientation. These forums have an opportunity to comment of PSNI policies at a developmental stage.

### Identified Outcomes of Section 75 on the Police Service and the public

- PSNI have benefited from receiving an increased level of consultation advice/information from subject experts
- Police policies have been revised in relation to specific advice received from the public and subject experts i.e.
- See specific outcomes listed below

## Outcomes broken down by Section 75 equality categories

### Race

- PSNI recruitment procedures now include greater support for people for whom English is not their first language
- All nine equality categories are now monitored in recruitment
- PSNI are examining potential strategies to encourage and support ethnic minority officers in seeking and gaining promotion
- PSNI have appointed a full-time Network Support Officer to support the ethnic minority police association. This will raise and establish the profile of ethnic minority officers from an organisational perspective.

### Sexual Orientation

- A full time Network Support Officer will be appointed to support the development of the gay police association within the PSNI. This will raise and establish the profile of gay officers from an organisational perspective and assist with police investigations of hate crime against the Gay community.

### Disability

- PSNI will shortly monitor and analyse applications for promotion from officers who have declared a disability and ensure the requirements of the DDA are fairly applied.
- Analysis has identified mental health and learning-behavioral difficulties as key a area of training needs. This has commenced and will be developed upon.

### Age

- Establish a monitoring strategy in respect of children and young people, which will provide data/information relating to interactions between police and the 9 Section 75 categories.
- Regularly review data/information available in respect of the perceptions of children and young people in regards to police and the service provided. This review will inform strategies and training.
- PSNI will actively pursue the integration of youth issues in to the PSNI College curriculum.
- We have established four Young Persons' Independent Advisory Groups these groups ensure that the younger voice is heard within the organisation.

### Marital Status

- Is now monitored as an equality category in PSNI recruitment
- To improve the quality of service to victims of domestic violence and sexual offences with each District to adopt the MARAC Model by April 09.

### Faith

- PSNI in partnership with its recruitment agency will research and analyse any trends in regards to success rates for Catholic, Non-Catholic community and unknown backgrounds.
- PSNI will invite officers from Catholic backgrounds to access the Positive Action Leadership Development Programmes.

### Gender

- PSNI are committed to the actions described under the Gender Action Plan first published in 2004 and revised in April 2008
- Gender is also one of the three priority areas described in the PSNI Shared Future (Diversity) Strategy published in June 2007 and

republished in July 2008. Actions under this Strategy will benefit public and internal staff.

- Where there is a clearly identified under representation of female officers, Human Resource will conduct personal career development interviews with female officers eligible for promotion to senior ranks. These interviews will be directed towards assisting officers identify skills and competencies needed to prepare them for meeting criteria for promotion should they wish it.
- PSNI will invite female supervisory officers to access the Positive Action Leadership Development Programme.
- A Network Support Officer has been appointed to support and raise the profile of female officers.

#### People with Dependents

- The recruitment strategies/programmes planned and initiated to assist those with dependents will be monitored and assessed as to the benefits or otherwise on this category of applicant.

#### Political Opinion

- Is now monitored as an equality category in recruitment
- PSNI is engaging with communities who have been disaffected from policing in the past and exploring options for the PSNI to engage in programmes aimed at helping Northern Ireland deal with 'the past'.
- We have increased organisational awareness of the impact of the "Troubles" through promoting the work of Crime Support Department and the Historical Enquiry Team (HET).

The PSNI's Equality Scheme has been a key driver for improved equality of opportunity in the Service and in the delivery of our services to the community. The PSNI Shared future (Diversity) Strategy and the PSNI's Gender Action Plan

2004 & 2008 have been developed in tandem with our Equality Scheme and in response to the wider government agenda. Our Shared Future (Diversity) Strategy sets out a plan for the Police Service of Northern Ireland (PSNI) to ensure that what we do is underpinned with fairness and respect.

In order to achieve our objectives we will:

- Ensure equality;
- Promote diversity;
- Contribute to bettering relations between different groups in our society; and
- Contribute to building trust between the two main communities in our society

Our Equality & Diversity strategic documents are freely available through the PSNI website and inform the public of what we intend to do; and what we expect from our police officers and police staff.

## **2b Equality Consultations**

We have undertaken the following equality related consultations since the Equality Scheme was approved in 2003:

### **Policy Screening**

- Review of policies screening in and out from 2003- 2005
- Implementation of the use of Taser
- Public Consultation on the Shared Future Strategy
- Public Consultation on the Gender Action Plan 2004
- Public Consultation on the Gender Action Plan 2008
- Disability Action Plan 2007-10
- Disability Discrimination Policy
- PSNI Engagement with Children and Young People
- Police Response to Hate Incidents

- PSNI Estates Strategy
- PSNI Reassurance Strategy
- Domestic Violence
- Operational Procedure and Guidance for Dealing with Persons with a Mental Disorder

### **Equality Impact Assessment consultation**

- Protection of Children and Vulnerable Adults
- Youth Diversion Scheme
- Police Service Recruitment Policy
- Police Service Promotions Policy
- The delivery of the Citizen and Safety Education in Schools
- Support for Victims
- The Use of Taser

Many consultations conducted by the Police Service, in relation to Section 75 involve the communication of a written consultation document to the Equality Scheme consultation list. This approach has some merit, as many consultees prefer to study documents in detail before responding. Getting the balance right between detailed information and an easy read is the challenge that faces all Public Bodies. We have received compliments from consultees in relation to our EQIA summary documents that can generally be read in a couple of minutes these are issues alongside the full and detailed analysis reports.

We engage with key stakeholders face to face either at our instigation or upon request. We have found face-to-face pre-screening especially in the EQIA process to be extremely useful, as we gain access to additional information and research material that would have been unavailable to us without these meetings. We have also used our Independent Advisory Groups as a useful way of seeking sectoral advice in relation to policies at an early stage of development.

## **2.c Our Consultees**

Our list of consultees has evolved to reflect the environment in which we carry out our function. As well as continually updating the list as consultees details change we also amend the list to include and remove consultees details in response to requests from consultees. This list currently exceeds 500 persons and organisations.

Our general approach to requests for information and inclusion is to accept these requests and to ensure that future mail-shots include the new consultees. We recognise that many of the organisations and or individuals have not engaged fully in relation to our consultation efforts. We will review our consultation strategy in 2008/2009 with a view to seek a better way of reach out and engaging people and organisations in our consultations. Sectoral Advisory Groups set up by PSNI have provided a useful source of information and these are open for to all to join.

PSNI in conjunction with our colleagues in the other Criminal Justice Agencies have decided to explore options for setting up a joint Criminal Justice consultation forum.

## **2.d Direct Consultations**

The PSNI has recognised that we need to consult directly with all Section 75 groups especially those within society who have experienced marginalization. The public has an opportunity to get involved in a range of Independent Advisory Groups organised by PSNI representing Disability, Youth forums X4, Older Persons Group, Multicultural and Sexual Orientation. These forums present an opportunity to comment on PSNI policies at a developmental stage and make suggestions in relation to priority areas that the PSNI should concentrate upon.

The PSNI has sought to provide feedback to consultees especially those who have provided substantive replies to our consultations – We have met with consultees face-to-face to discuss EQIA findings with groups including: - The Children’s Law Centre and the Committee on the Administration of Justice. We as part of our EQIA’s provide a consultation matrix where we give consideration to all replies and provide a considered response to the points raised by our consultees. By showing consultees that their views have been considered and where appropriate incorporated into our policies and procedures we hope to ensure that consultees feel valued thereby encouraging further participation.

## 3. Assessment of Equality Impacts

### 3.a Policy Screening Review

Since 2003 the Police Service have screened 113 policies and procedures 14 of which (12%) have resulted in a 'screened in' decision. We have not disaggregated the decision making for the purposes of this review but have formed the view that the Good Relations screening question poses the greatest misunderstanding among our policy writers:

*'Is there an opportunity to better promote equality of opportunity or better community relations by altering the policy or working with others in Government or in the larger community?'*

The feedback that we have received from our Policy Writers suggest that if this screening question is posed at an early stage in the policy development cycle there will be of course an opportunity to influence the policy so that the promotion of equality and good relations can be incorporated thereby altering and influencing the policy in development. We accept that the screening is not a substitute for an Equality Impact Assessment but where an obvious change can be made that promotes equality and good relations these changes are made at an early stage.

At first glance a 'screened in' rate of 12% would appear to be quite low, however much of what we describe as policy work is in fact procedural guidance on current legislation. These policies re-present legal requirements placed on officers and present them in the format of a Service procedure. If this type of policy work was removed the percentage of screening in decision is estimated to be closer to 25%.

The Police Service would like to see better guidance made available to 'Public Authorities in relation to screening. We have noted that the screening question *'Is*

*there any evidence of higher or lower participation or uptake by different groups'*

If answered yes, is viewed as sufficient reason to carry out an Equality Impact Assessment. However experience has taught us that in relation to, for example internal policies that affect our own workforce composition we have certain fixed groups such as more female Police Staff and more male Police Officers, any internal policy will by default affect one group more than the other. Greater weight seems to be put on the screening question that seeks to identify if any groups have different needs or priorities in relation to the policy.

### **3.b Screening and consultees input**

There are three clear examples where consultees have argued that the PSNI assessment of equality impact was wrong during the screening process these are - Youth Diversion, Emergency Response and Taser. The PSNI have accepted the arguments advanced for each screening and have agreed to carry out an Equality Impact assessment on each area.

Consultation has been able to highlight areas of weakness and methods of redress that were not obvious to the policy developers. To this end the consultation process has been of great value in some instances and enabled the Service re-think our original assessment as recorded above.

As mentioned, in certain cases the PSNI re-screens policies following consultation. The information, generally qualitative, has proved a valuable source of information to help inform the screening process where no available information existed previously. The PSNI see's benefit in carrying out pre-screening consultation with subject experts to avail of the best and most current information on which to make our assessments.

### **3.c Screening of new and revised policies**

All EQIA's carried out by the Police service to date are the result of reviewing existing policies with the exception of the police Severance arrangements and the proposal to introduce Taser into the Service.

From the outset of policy development and review of policies the PSNI screens for equality impacts and human rights implications. Two separate screening tools have been developed. This process is still in place however the equality screening form has been amended and includes additional questions to help facilitate the screening process. The additional questions allow for the identification of stakeholders, define the aim of the policy and ask for additional available information to help inform the screening process before proceeding to the standard screening criteria. The information collected is similar to that needed for an EQIA. We now require that both policy writer and policy owner (usually Dept Head) both agree the screening decision prior to further consultation.

The PSNI do not have one central policy unit that has responsibility for all policy development, but rather policy development is the responsibility of various Departments and Branches that utilize the experience of subject experts throughout the organisation. However all policy development must adhere to published written guidance; before any policy is adopted it must be either signed off by Head of Department (Dept policy only) or by the Chief Constables Forum (CCF) for policies that effect the whole organisation. We ensure that no policies will be considered at senior level without being first audited for Human Rights and Equality considerations. Evidence must be supplied that these issues have been considered and resolved prior to Senior Officer approval.

All Section 75 Screening decisions are submitted to the Section 75 Manager who advises policy writers and owners in relation to any improvements that could be made to support the screening decision.

### 3.d Equality Impact Assessment timetable and monitoring

There has been slippage from the initial EQIA timetable, due to a variety of reasons including limited available data, limited sources of expertise and limited resources for multiple exercises. Some policies have been completely revised and re-screened as a result with the impact that they no longer are deemed to have a negative impact. A clear example of this has been in the area of Media & PR where the original screening in 2004 indicated that there was a potential negative impact on 'Political Opinion' because not all areas of the press would engage with our press office. The situation has now reversed.

Given the limited number of EQIA's conducted in the organisation expertise is still being developed. The PSNI's Section 75 manager provides advice and assistance in the EQIA process.

Since publishing our schedule of EQIA's following public consultation in December of 2005 the Police Service has completed or started seven EQIA's four of which are at stage 7 in 2008 and one at stage 6, the remaining two EQIA's will reach stage 6 by the end of 2008.

PSNI have relied heavily on consultancy support to assist with the report writing and gathering of data. Our Equality & Diversity Unit have in 2008 secured the services of a full time Police Analyst who will, going forward offer in-house expertise in analysis of equality data. This post holder has done much since arrival to scope out the amount of equality data held within the service and will be responsible to harmonizing the collection of data and identifying where gaps exist and prioritising areas where equality data is needed. This data once captured must be made available internally for our policy writers to base their assessments of the impacts on equality.

## 4. Monitoring

Section 75 was of course a landmark provision. Its stipulation that public authorities should have “due regard to the need to promote equality of opportunity”, and “regard to the desirability of promoting good relations” placed positive duties on public bodies, separate from the requirement not to discriminate. PSNI Senior Management Team is committed to taking these duties forward within our organisation.

Implementing these duties has raised difficult issues in relation to monitoring of our services to the public - much more so because we operate in a law enforcement environment. PSNI along with the rest of the public sector have suffered as a result of delays in receiving the Equality Commission’s guidance on what the duties meant in practice.

A scoping study commissioned by the Criminal Justice Board in February 2005 identified options that led to a self-classified equity monitoring pilot scheme in the form of an arrestee survey administered by externally commissioned independent researchers in a sample of PSNI custody suites across Northern Ireland. This pilot concluded in February 2006 and provided many valuable lessons - not least that the model used in the pilot was not viable in the longer term - and provided the information which enabled PSNI to construct a workable arrangement in Custody suites that has now commencing in July 2008.

The Police service from June 2007 monitors all 9 categories in our recruitment processes. Progress towards this goal has been incremental over the last few years. Arrangements have also been put in place to complete the equality gaps for existing employees together with plans that will seek to refresh this data on a two-yearly basis.

PSNI has met with some opposition in relation to the gathering of this equality data especially so in relation to Political Opinion, which many people feel is not information that will assist the police. There is a strongly held view that that in order for the public to have faith in the Police Service it should be seen to be completely apolitical. The Police Service is in discussions with the Police Federation and Staff Unions in relation to this issue in June 2008.

## 5. Equality Impacts Assessment Publication

### 5.a Published Reports

PSNI have published 5 EQIA's to date and all have been published on the Section 75 area of the site that is hyperlinked from our Equality & Diversity Units main page. Our consultees are informed during the consultation phase that the results will be published in this way.

[http://www.psnipolice.uk/index/departments/pg\\_equality/implementation\\_of\\_psnis\\_section\\_75\\_responsibilities.htm](http://www.psnipolice.uk/index/departments/pg_equality/implementation_of_psnis_section_75_responsibilities.htm)

Each policy holder is responsible for putting in place a monitoring framework following the EQIA and each EQIA will explain how this policy will be monitored going forward. The PSNI Section 75 Manager on a yearly basis liaises with policy writers and seeks an update on progress of the monitoring of the policy and records progress to inform the Progress Report to the Equality Commission NI. PSNI have four policies at Stage 7 that will be reported on during 2008.

PSNI have not received any request for alternative formats for the results of EQIA's but are happy to meet these requests when received.

## 6. Equality Impact Assessment Consultation

### 6.a Mitigation measures and alternative policies as a result of consultation

From 2003-2008 the Police Service has not as a result of an EQIA decided not to implement a policy but have considered mitigation of identified negative impacts. This is largely due to the circumstances that only two of the EQIA's related to new policies i.e. The PSNI Severance programme and the introduction of Taser. All other EQIA's related to current policy and practice.

From the EQIA work carried out to date consultees have largely agreed with our assessment of impacts especially in relation to which groups were like to be impacted. For example in the Taser EQIA Consultees agreed with our assessment that the Section 75 Groups of Younger People, Women and Disabled people would potentially suffer a negative differential Impact. Much of the discussion in relation to this EQIA involved the quality and relevance of data that was presented and the interpretation of this evidence. While many consultees argued that the impacts were so severe that the policy to introduce Taser should be abandoned, the PSNI asserted that while the potential for harm is a reality, the deployment of this device would happen so infrequently and with mitigation including enhanced training that the impact was seen at the low end of the spectrum.

Where a new policy is under consideration and it becomes apparent at the screening stage that the policy will never be able to mitigate serious equality concerns we are of the view that the policy should not be progressed until such mitigation can be achieved or alternative policies explored.

PSNI has a strong equality and human rights focus and robust internal mechanisms through which consultation and engagement with key stakeholders

has been practiced for many years, which has resulted in early identification of potential negative differential impacts at an early stage. When consideration of equality becomes an integral part of the policy development process it has the effect of minimizing the need for impact assessments at a later stage.

## **6.b Changes to policy as a result of consultation**

The following are examples of changes to policy that have occurred as a direct result of EQIA consultations: -

### **Recruitment to PSNI**

- From 2007 all applicants and appointees, both police and police staff, have been requested to provide data/information in respect of all nine Section 75 categories. This will form part of their personal record, if successful, and steps are being taken to allow all employees to access and update their personal record including information in respect of equality. This will also allow all nine Section 75 categories to be monitored and potential impacts identified.
- PSNI in liaison with its recruitment partner agency will continue to review the content of its communication mediums to ensure information is accurate, understandable (font, etc.) and informative for all categories. Especially for those for whom English is not their first language.
- PSNI in partnership with its recruitment agency will research and analyse any trends in regards to success rates for Catholic, Non-Catholic community and unknown backgrounds.
- PSNI in partnership with its recruitment agency will actively research the use of additional recruitment initiatives to improve application rates and

success rates for candidates with specific focus on the Initial Selection Test. A definitive initiative will be established for the next recruitment campaign and results of its effect analyzed.

### **Youth Diversion Scheme**

- Establish a monitoring strategy in respect of children and young people that will provide data/information relating to interactions between police and the 9 Section 75 categories
- Regularly review data/information available in respect of the perceptions of children and young people in regards to police and the service provided. This review will inform strategies and training.
- Establish a number of Young Persons' Independent Advisory Groups by March 2007, which can collect qualitative data on operational service delivery to young people.
- To identify potential training needs on learning disability and young people through the opinion mechanism of the Independent Advisory Groups.
- The YDS General Order will be revised and refreshed, with a view to eliminating any lack of clarity and taking into account the experiences of the YDS within its first two and a half years of operation;
- The requirement for some form of "bureau" style approach is presently being pursued with the cooperation and engagement of other agencies and will involve a structured arrangement for regular case conferences between agencies, agreed protocols for information sharing, and better inter-agency contact targeted on the needs of the individual young person;

## Promotion In PSNI

- Where there is a clearly identified under representation of female officers, Human Resource will conduct personal career development interviews with female officers eligible for promotion to senior ranks. These interviews will be directed towards assisting officers identify skills and competencies needed to prepare them for meeting criteria for promotion should they wish it.
- PSNI will continue to monitor and review the number of Catholic officers seeking and gaining promotion.
- PSNI will invite officers from Catholic backgrounds to access the Positive Action Leadership Development Programme.
- PSNI will examine potential strategies to encourage and support ethnic minority officers in seeking and gaining promotion.

## Protection of Children and Vulnerable Adults

- Community Safety Branch will by February 2007 establish Independent Advisory Groups (IAGS) in respect of children and young people. These IAGs will provide a platform to regularly measure the perceptions and views of Children and Young People in relation to policing related issues.
- The Police Service of Northern Ireland will establish a process to provide reliable data/information on the sect 75 groups by Jan 2008. (Any introduction of Equality Monitoring into PSNI must be mindful that this information may be of use to other Public Bodies within the Criminal

Justice System and hence compatible with for example Causeway as well as National Police Records).

- Community Safety Branch will liaise with Northern Ireland Council for Ethnic Minorities to consider the need to organise a conference on Child Abuse by July 2007. Community Safety will also liaise with MENCAP and other organizations representing people with disabilities to consider if there is a need to organise a conference in respect of Child Abuse and the problems encountered by this group in reporting by March 2007.

## 7. Section 75 Training

### 7.a Training arrangements

An initial Section 75 awareness raising training programme was designed that was subsequently adapted to meet the particular needs of the participants eg: senior managers, middle and junior managers, staff at non-management grades. This course was developed and delivered with the help of subject expert John Kremer QUB.

Following on from the initial training PSNI amended its induction training for new officers and staff to include awareness of Section 75 as a part of our Equal Opportunities training for all new employees.

The internal Intranet site has a dedicated Section 75 area which hosts a bespoke PSNI guide to policy screening together with a Screening Tool along with links to our policy guidance materials that are published internally. This Section 75 area of our intranet site is a part of the much larger Equality & Diversity site that hosts all PSNI guidance in relation to equality issues.

PSNI Corporate Development Department has overall responsibility for policy development within PSNI. This Department on an annual basis organises policy training for policy writers. This policy writer's course includes significant input on the subjects of Human Rights and Section 75 equality screening. These courses run on average four times per year.

PSNI have an extensive range of equality & diversity training available to officers and staff both face-to-face and also online. All equality & diversity training will reference the positive duties that PSNI as a statutory body here in Northern Ireland has to promote equality and good community relations. Training materials

developed in GB have been amended under license to include NI equality legislation including Section 75. A good example of this amended GB training is the Core Leadership Development Programme, which is a UK wide training programme for all Police Managerial ranks. This material now includes a description of the main requirements of Section 75 for police officers in Northern Ireland.

PSNI training courses that feature Section 75 include

- Initial Section 75 Training for managers
- Course for All – All officers and staff
- Diversity Works – Police Officers
- Diversity Now – On-line training for Police Staff
- CLDP – Managerial – Police & Staff
- Induction training - Equal Opportunities Module
- Policy Writers Training

#### **7b Learning outcomes**

All personnel within PSNI have received Section 75 training and certainly there is a general awareness that PSNI needs to promote equality of opportunity. We are aware that the precise mechanics of policy screening and EQIA are not fully understood by everyone, including policy writers and hence the need to continually update policy writers with the necessary knowledge and skills. PSNI do not have a static team of policy writers, as there is substantial organisational 'staff churn' within Districts and Departments. This turnover of staff in key policy writing roles requires an annual programme of training for policy workers.

After the delivery of training for policy writers we observe an increase in the quality and quantity of screening decisions thereby validating the decision to make these regular training courses.

## 8. Access to Information

### PSNI Equality scheme stated

*The Police Service is committed to effective communication with the public. It recognises, however, that there is a risk that some sections of the public will not enjoy equality of opportunity in accessing information provided by the Police Service. The following are particular areas of concern:*

- people with sensory and learning disabilities may have particular difficulties with information in print;*
- members of minority ethnic groups, whose first language is not English, may have difficulties with information provided only in English;*
- some local newspapers are read predominantly by members of only one community.*

In reviewing the PSNI's provision of information to the public we have noticed that there have been few requests for information in alternative formats. The most frequent request has been for information to be provided in large print Braille or audiocassette. All requests for information have been met in a timely manor. PSNI have a proactive policy of providing our major documents in alternative formats including local policing plans and the Chief Constables Annual Report. Local policing plans are translated where appropriate into minority languages that reflect the policing district/area. The Chief Constables Annual report is translated into minority languages based upon analysis of our most frequently used interpreter requests. We also regularly translate into Irish and make our annual report available as an audio mp3 download.

We have an extensive database of Consultees (over 500), this data base is updated regularly to reflect changes of address and changes in contact details of individuals. We will include any individual or organisation that express a desire to be included. For all EQIA consultations public notices are placed in the three largest circulation local papers and links to our consultation documents are placed clearly on the Home Page of our website.

For each EQIA PSNI contact our database of consultees to inform them of the EQIA that is commencing and also take the opportunity to inform them of other equality work/consultations. In response to these mail-shots we receive feedback including requests for hard copy documents, amendments to our data base details and of course feedback consultation replies.

We wish to improve our provision of information to the public generally and to consultees in particular. We will from 2008 onward design a newsletter that will be posted to our database of consultees. This newsletter will highlight the equality work that the PSNI is engaged in and clearly list the opportunities for consultees to get involved in policy screening and EQIA work. We will also highlight opportunities to get involved in Independent Advisory Groups representing many of the equality categories described under Section 75. This newsletter will be published in a short easily read format and use photographs and graphics to make them more attractive to read and keep.

## 9. Review of Timetable

The PSNI as one of the larger public bodies in Northern Ireland has experienced some delays in our implementation of Section 75 most notably in the time that it took from approval of the scheme to begin the process of reviewing all our policies and procedure. Given the size of the organisation the process of internal review took much longer than originally anticipated, as this process was not completed until early in 2005. This also then affected the schedule of EQIA and the implementation of an effective equality-monitoring framework.

PSNI have now in place a Section 75 manager who is responsible for ensuring that the PSNI comply with the requirements of the PSNI Equality Scheme. The organisations Strategic Diversity Management Board offers a mechanism through which effective internal monitoring of progress can be maintained and reported.

## 10. Publication of the Scheme

PSNI Equality Scheme states:-

*Following submission to the Equality Commission, the Police Service's Equality Scheme (revised as appropriate following the consultation process), will be made available in print form and accessible formats free on request from, Section 75, Equality & Diversity, PSNI Lisnasharragh, 42 Montgomery Road, Belfast, BT9 6LD. It can also be accessed on the Police Service's Internet website at <http://www.psnipolice.uk/>*

The above commitment was met in full. All requests for information in alternative formats were met. Although it is worth noting that any requests for alternative format version of the equality scheme have been low in number.

The PSNI will in future devise a monitoring framework for all such requests to analyse what further work is required to make our information more widely available.

## 11. Complaints

PSNI's commitment to resolving complaints received under our Equality Scheme is as follows:-

*The Police Service will carry out an internal initial investigation of the complaint and will undertake to respond to the complainant within one month.*

*In responding to the complainant, the Police Service will inform them or their representative of the procedure for pursuing the complaint further with the Equality Commission, as set out in Paragraph 10 of Schedule 9 to the Northern Ireland Act 1998.*

*In any subsequent investigation by the Equality Commission, the Police Service undertakes to co-operate fully and to provide access to any relevant documentation that the Commission may require.*

*Similarly, the Police Service will co-operate fully with any investigation by the Equality Commission under subparagraph 11(1) (b) of Schedule 9 to the Northern Ireland Act 1998.*

*Complaints relating to the failure of the Police Service to comply with this Scheme must be submitted to the Equality Commission within twelve months from the day on which the complainant first knew of the matters alleged.*

We have received one official complaint alleging a breach of our equality Scheme. This complaint was received from a member of staff who felt that he was personally disadvantaged as a result of a criterion in the PSNI early severance scheme. The issue was investigated thoroughly but not resolved for

the individual who then took his complaint to the Equality Commission who were satisfied that PSNI had met our obligations under Section 75.

## 12. Commitment to Review

This report has been completed by PSNI according to our schedule of actions as described in our Equality Scheme first published in February 2003. The process of conducting a five-year review has been a valuable exercise that has focused attention on the areas of achievement and also the work that remains to be completed.

This review has been completed using the Equality Commissions template for Five Year Review as a guide.