
PSNI

SECTION 75

EQUALITY IMPACT ASSESSMENT SUMMARY

**PROTECTION OF CHILDREN
AND VULNERABLE ADULTS**



Published March 2007

1 EXECUTIVE SUMMARY

This report presents the results of an Equality Impact Assessment (EQIA) in regards to the Protection of Children and Vulnerable Adult Policy and Protocols as administered by the Police Service for Northern Ireland (PSNI). It follows an EQIA Consultation Paper presented for public consultation in July 2005.

It is based on the available data in relation to Section 75 categories in the area of Child Protection and Vulnerable Adults. While this EQIA has identified the limited availability of data in regards to Section 75 categories in this area the consultation process has provided valuable qualitative data/information, which has informed the EQIA.

A small number of written responses to the consultation report were received. In addition, a number of responses were collated through meetings and focus groups organized as part of the consultation process. In coming to the final decisions as presented in this report, PSNI considered the issues raised during the consultation period alongside existing data.

As a result, PSNI will implement and monitor a series of actions to ensure equality of opportunity. We would like to thank all those who have contributed to this process. If you have any queries about this document and/or its availability in alternative formats (including Braille, disk, audio cassette or in minority languages to meet the needs of those who are not fluent in English) then please contact:

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1.1 Results

Availability of data – This EQIA has identified the limited valid and reliable data held in regards to Section 75 categories in this area. PSNI work in partnership with several agencies and bodies, statutory and voluntary in regards to ensuring the protection of both Children and Vulnerable Adults and data should be available in accordance with this partnership.

Potential Adverse Differential Impacts – No adverse differential impacts as a result of the written policy or protocols were identified. Potential problems were identified in regards to reporting abuse or gaining access to services.

Under Reporting – It was felt that there was general under reporting of abuse with specific reference to those with disabilities, dependents and ethnic minority groups.

Police and Children and Young People Interaction – The negative perceptions of some children and young people have also been raised during this EQIA. Though not directly linked to the Child Protection Policy what may be causing them is of concern to PSNI.

1.2 Decisions

PSNI will take the following actions to address the results and findings from this EQIA:

1. Equality & Diversity Unit will by July 2007 scope out the work required to introduce the collection of Section 75 data/information at the point of contact between police and public in regards to all requests for a police service.
2. 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).
3. Community Safety Branch by June 2007 will raise the concerns about under reporting with partner agencies and seek collaboration in examining the issues, rationales and potential outreach programmes to counter this phenomenon.
4. 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.
5. Community Safety will 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.
6. Community Safety will highlight this issue at both Child Protection and Vulnerable Adult Forums, such as the Vulnerable Victims or Intimidated Witnesses (VVIW) Steering Group, by March 2007.
7. Community Safety will by April 2007 liaise and consult with relevant organizations and individuals concerned with young carers with a view to examining the issues and concerns. This data/information will be raised at both Child Protection and Vulnerable Adult Forums by July 2007 with a view to initiating action in regards to any issues.

8. 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.
9. Community Safety Branch will annually review relevant data/information available in respect of the perceptions of children and young people in regards to police and the service provided. This view will inform communication strategies and training.
10. Community Safety Branch will by May 2007 liaise with MENCAP and Disability Action in regards to the perceived phenomenon of under reporting and raise the outcome of those meetings with the Vulnerable Adult Forum

2. BACKGROUND TO THE PROTECTION OF CHILDREN AND VULNERABLE ADULTS

The EQIA is directed towards the area of Protection of Children and Vulnerable Adults. It should be noted that most of this policy area is based on partnerships with other agencies and bodies involved in the protection and welfare of both children and vulnerable adults. PSNI is committed to the Ten Year Strategy for Children and Young People in Northern Ireland for 2006-2016 established through the auspices of the First and Deputy First Minister. While PSNI has been designated with specific areas to lead on, e.g. Road Safety, other areas i.e. abuse and bullying are either lead by another agency (DHPSS in regards to abuse) or shared with other agencies and organizations. It should also be noted that most of the data and information relating to these groups is not owned by any one agency or body. Due to this there is a sharing of most of the protocols and procedures used in this policy area and they are equality screened in that spirit of partnership. To be accurate or sufficiently reliable any analysis of data in relation to these areas also needs to be addressed in the same spirit of partnership and co-operation. While recognizing that, this EQIA attempts to identify potential adverse differential impacts in relation to the areas that are owned by the PSNI.

There are three clear Policies or Protocols that cover this area:

- o PSNI Child Protection Policy
- o Protocol for Joint Investigation by Social Workers & Police officers of Alleged & Suspected Cases of Child Abuse – Northern Ireland.
- o Protocol for Joint Investigation of Alleged and Suspected Cases of Abuse of Vulnerable Adults

The basic aim of the three policies/protocols is the protection (from abuse) of Children and Vulnerable Adults. It is also directed towards benefiting Children and Vulnerable

Adults who have suffered abuse through effective, efficient and client centred investigations of alleged or suspected crimes

All aspects of investigation and training for police and their partnership agencies e.g. Department of Health, Social Services and Public Safety (DHSSPS) Boards, Trusts, National Society for Prevention of Cruelty to Children (NSPCC) etc. are set out in the Protocol for Joint Investigation by Social Workers & Police officers of Alleged & Suspected Cases of Child Abuse – Northern Ireland. It is continually monitored and evaluated by all the agencies involved. It is also included in the PSNI Child protection Policy.

While the Joint Protocol provides guidance etc in relation to joint matters the PSNI Child Protection Policy is a comprehensive policy established under the guidance of a Child Protection Advisory group. This group consisted of several partner agencies and interested organisations, the following being core members:

- National Society for the Protection of Children (NSPCC)
- Northern Ireland Office (NIO) - Youth Justice
- Social Services Inspectorate - Child Protection Standards
- Department for Health and Social Services and Public Safety (DHSSPS)
- Children's Law Centre
- Eastern Health and Social Services (EHSS) [Representative of Assistant Directors, Social Services]

In addition the Northern Ireland Human Rights Commissioner (NIHRC) and Northern Ireland Commissioner for Children and Young People (NICCY) were provided with copies and submitted comment to PSNI. Those comments were addressed prior to publication and implementation of the policy in 2005.

The policy not only incorporates the investigation of abuse (as covered in the Joint Protocol for Child Abuse) but also sets PSNI core standards in respect of its dealings with Children and Young People. All other policies that refer to Children and Young People will be audited to the Child Protection policy. The policy was implemented in August 2005.

The Protection of Vulnerable Adults is dealt with under the Protocol for Joint Investigation of Alleged and Suspected Cases of Abuse of Vulnerable Adults and PSNI shares with partnership agencies in this protocol.

3 DATA COLLECTION AND CONSULTATION

3.1 Data Collection

Data/information was collated in regards to the general population of Children and Young People who would be impacted by the policy etc. In addition data/information in respect of Children and Young People's interaction with the police service was also taken account of. This was mostly research and surveys undertaken by several different bodies and individual researchers.

3.2 Consultation

A consultation process was employed which attempted to reach and engage not only those the policy impacts on but those who had an interest in and direct involvement with the specific groups the policy is aimed at. A full twelve-week period of consultation was set-aside for this EQIA, which ran from the 7th July 2006 to 29th September 2006.

The following actions were taken:

- Letters were distributed to 500 individuals and organizations informing them of the consultation and availability of relevant consultations documents.
- Prominent advertisements were placed in the *Belfast Telegraph*, *Irish News* and *News Letter* newspapers, inviting comment in accordance with good practice.
- Direct accessibility to IT formats via the Home Page was offered on the PSNI's website.
- Offers for individual consultation meetings were made available. No requests were forthcoming.
- PSNI offered the availability of suitable copies of documents in diverse formats and in a timely manner. No requests were made.
- A number of meetings (26) and focus groups (6) were arranged involving not only children and young people on whom the policy/protocols has most potential to impact but also individuals and organizations etc. who have direct involvement with those children and young people.

The Key Findings set out below reflect the analysis of data and both written and focus group/meeting submissions/responses.

4 KEY FINDINGS

- ❖ Availability of Data - No data based on Section 75 categories is available within this field.
- ❖ Outcomes - Written policy and joint protocols are considered to have a positive impact with no adverse differential impact identified.

- ❖ Under reporting – the potential for under reporting has been highlighted with specific reference to those with disabilities, dependents and ethnic minority groups.
- ❖ The use of Children and Young People in a covert intelligence roll is highlighted as an area for concern.
- ❖ Service delivery - Concerns have been raised in regards to the service delivery of policy in respect of a number of Section 75 groups. Most of these relate to perceptions.

5 CONCLUSION

This EQIA has been applied with limited availability of specific data/information in relation to all Section 75 categories, PSNI does believe that it has attempted to address the potential impacts identified initially and to seek to identify others that may exist. The EQIA and the consultation process was utilised to try and identify all potential impacts across all categories. Four distinct areas have been identified from this EQIA and PSNI would comment on these as follows:

Availability of data on Section 75 Categories

PSNI recognises that specific data is not available in relation to all Section 75 categories in this policy area. Steps are being taken to rectify this problem by establishing an effective, efficient, valid and reliable means of acquiring and collating data on Section 75 Categories for the whole organisation.

Under Reporting

The aim of the Child Protection Policy is to provide standards for police officers in both investigation of complaints of abuse and interaction with children and young people. Under-reporting does appear to be an area for concern but there is nothing to indicate that the PSNI policy has an impact on this. Reasons for under-reporting from any group may apply across a range of policy areas and needs to be identified and addressed as part of an overall engagement strategy. In relation to Child Protection and in line with the Ten Year Strategy for Children and Young People in Northern Ireland for 2006-2016, PSNI see this as being best done as part of a multi-disciplinary approach.

PSNI are concerned about the potential impact the factors that prohibit reporting may have on groups and are keen to engage with any group or organization in regards to this concern. From the consultation there is general agreement among respondents that the Child Protection Policy addresses the issues around Child Protection. The suggestions of outreach and awareness raising strategies to counter potential under reporting are appreciated but PSNI feels this should be approached from a multi-disciplinary perspective. PSNI have participated in joint conferences and workshops and are in the process of organizing a conference with the NSPCC targeting sporting organizations, local groups and individuals, e.g. coaches. In regards to the general

under reporting of child abuse and possible vulnerable adult abuse, PSNI is committed to working in partnership to resolve this phenomenon.

The emphasis on the perceived under reporting was on ethnic minority groups and those with disabilities. The consultation has also highlighted a perceived significant under reporting from those with learning disabilities. PSNI have already explored issues around communication and access for disability groups in cooperation with specific agencies. PSNI in conjunction with Mencap published and distributed a booklet for people with learning disabilities to educate and raise awareness of how they can communicate with and access services of the police. Community Safety Branch would like to build on this and enhance communications to and for this group and those within ethnic minority groups.

Community Safety Branch is grateful for the comments relating to the concerns regarding the position of young carers. This is something that should be examined but needs to be done so through partnership with relevant agencies and organizations, statutory and voluntary. The carer organization referred to the need for a multi-disciplinary approach. The need to engage with relevant organizations and young carers is important to advancing this issue.

Training for police officers in awareness of child abuse and its many forms, responding to reports or suspicion of abuse, investigation and availability of advice and support is being provided. This includes identification of signs and symptoms of possible abuse. The introduction of the UNOCINI risk assessment process will provide a common approach to the multi-agency approach to Child abuse.

The Child Protection Policy

The Child Protection Policy is established to provide the baseline or core standards for interaction and involvement between police and young people up to the age of 18 years. Community Safety Branch welcomes the general positive comments on the effectiveness of the policy.

The use of children and young people in covert intelligence has been referred to in the responses. Community Safety Branch notes the concerns raised by respondents in regard to this area. Community Safety Branch does however believe that this form of investigation may be appropriate and that the ACPO Guidelines provide appropriate direction for those approving and engaging in such forms of policing methodology.

The police service in Northern Ireland has a history of pursuing interaction and engagement with children and young people. The Community Safety Branch, as it is now known, have either independently or in partnership with other agencies and organizations (statutory and voluntary) established, organized and/or participated in numerous schools liaison programmes, conferences, seminars and cross community projects etc. The Community Safety Branch URZONE website is targeted towards children and young people to provide advice and direct access to the service. It

includes a facility for participants to air their views and concerns and get answers to queries.

Vulnerable Adults

PSNI believes that the present Joint Protocol for Vulnerable Adults adequately covers the protection and investigation of complaints of abuse from Vulnerable Adults. In addition to the Joint Protocol for Vulnerable Adults the PSNI Policy Dealing with Victims and Witnesses also mentions vulnerable victims and provides direction in this respect. The PSNI are also represented on the Vulnerable Victims or Intimidated Witnesses Steering Group, which is chaired by the NIO Criminal Justice Policy Division. This provides for an inter-agency forum (both public and private sector representatives) to examine best practice initiatives and create debate on revision of existing policy etc within the various representative bodies. Additionally there is the Regional Adult Protection Forum, which the PSNI are represented upon. In September 2006 a new document was published and is to be distributed throughout NI. This was endorsed at Ministerial level and is named 'Safeguarding Vulnerable Adults'. This document provides for the promotion of adult protection including policy and procedures to be adopted. Within this document full referral is made to the Joint Protocol procedures currently adopted by the PSNI and Social Services.

Though the investigation of abuse is covered by a Joint Protocol, PSNI note the concerns raised in relation to the potential for under reporting among people with disabilities of all ages as referred to by Disability Action and Mencap during consultation of this EQIA.

Monitoring

While no adverse differential impacts have been identified as a result of the EQIA process a number of actions have been decided on that will enhance the policy and equality of opportunity and good relations. These will be monitored and assessed after twelve months. Both quantitative and qualitative data will be employed in this process.

The commitment to introduce Section 75 equality monitoring of policing services as they are delivered to the community has been made a direct result of this EQIA. The Policing Plan 2007 - 2010 has been amended to include the introduction of equality monitoring at point of contact during 2007 –2008, progress on the implementation of this will be monitored by the Policing Board.