



Heddlu Gwent Police

Equality Impact Assessment Screening Template

This document provides a framework for an Initial Equality Assessment for initiatives including policies, procedures and operations. This framework will allow us to systematically judge the relevance to Gwent Police's public equality duties and also the potential level of impact to our communities.

Responses to this screening template will be scored on three dimensions.

1. The extent to which the initiative is relevant to our public duties (1= neutral to 3= highly relevant)
2. The level of impact the initiative will have on our communities (Low =1, High=3)
3. The extent to which the initiative will have an impact on our communities. (Low =1, High=3)

If a score of over 44 is achieved the proposal is deemed to be relevant to our equality duties and have the potential to have a significant negative disproportionate effect on our communities. Therefore, we need to conduct a Full equality impact in order to examine the potential impact further.

Scoring

| Score | Level of Impact | Level of EIA |
|--------------|------------------------|---------------------|
| 22-44 | Low-medium | Initial |
| 44-66 | Medium-high | Full |

Initially we will prioritise conducting equality impact assessment for initiatives which score over 50+

1.0 Reference Information

| | |
|--------------------------------------|----------------------------------|
| Title | Direction and Control Complaints |
| Reference: | 101/8b issue 3 |
| ACPO Business Area Lead: | DCC |
| Written By: | Policy Officer |
| Service Area/Department Responsible: | Professional Standards |
| Lead: | Professional Standards |
| Review Date | Feb 11 |

2.0 Statement and Intentions

2.1 What are the aims of the initiative, how do they fit in with the wider aims of the organisation?

To ensure that Gwent Police deal properly and effectively with all forms of complaints and that the lessons from such complaints are considered and assessed to inform the development of local policy and practice and enhance the effectiveness of local policing.

2.2 What are the motivators/driving forces in the development of this initiative? (e.g. national context)

This procedure is intended to set out clear direction as to how the organisation will deal with direction and control complaints.

The introduction of the IPCC (Independent Police Complaints Commission) and the implementation of the Police Reform Act 2002 and the Police (Conduct) Regulations 2008 brings in legislative requirements in respect of complaints against police that have been established to create a more open and transparent system.

Details of recording public complaints alleging misconduct are not covered by this procedure and are dealt with in accordance with the provisions of the Police Reform Act 2002 and the Police (Conduct) Regulations 2008.

However, there are other matters that are brought to the police that are not recordable misconduct matters. Section 14(2) of the Police Reform Act 2002 (remains unaffected by the Police (Conduct) Regulations 2008) provides the power for the Secretary of State to issue guidance to Chief Officers and the Police Authority concerning Direction and Control complaints.

The precise nature of the investigation or consideration of each complaint, which relates to the Direction and Control of the force will be determined by the terms of the complaint itself.

Heads of Service Area, Local Policing Unit Commanders and Departmental Heads should therefore consider this on a case by case basis. Nevertheless, the same principles should apply as they do to any other type of complaint – namely, that each complaint is considered carefully and on its individual merits. Timely responses, to meet our current correspondence handling standards, should be provided to each and every complaint relating to Direction and Control of the force, which should provide as full a response or explanation as is reasonably possible to provide.

The effect of the Police Reform Act 2002 and the formation of the IPCC is to create three basic areas of complaint

- Misconduct
- Civil Claims
- Direction and Control

In addition to these there are the normal day to day contacts with Gwent Police by the public regarding questions and queries about our work, policies, procedures and practices. Nothing in this procedure is designed to change the way we deal with those issues.

This procedure details the recording procedures to be adopted when dealing with matters of complaint that fall outside recordable misconduct complaints. It is not intended to significantly alter the way these issues are resolved **within the relevant Service Areas, Local Policing Unit and Department** . It is merely to create a corporate method of recording to meet the legal requirements. A significant benefit will be that themes and corporate issues will be able to be identified across the Force.

Nothing in this procedure affects the way that Service Areas, Local Policing Units and Departments currently handle enquiries, questions, communications and requests through normal correspondence channels.

3.0 How will the initiatives be relevant to our duty to:

| Duty | Evidence | Relevance 1=neutral, 3 = highly relevant |
|---|---|---|
| <p>Promote equality of opportunity? (e.g. recruitment initiative offering part-time working)</p> | <p>This procedure is open to any member of the public and embodies a national approach in relation to dealing with such complaints.</p> | <p>3</p> |
| <p>Eliminate discrimination? (e.g. Stop and Search being Intelligence led)</p> | <p>One of the aims of the procedure is to ensure there is a mechanism for individuals to complain and for the organisation on anything relating to its processes to change where necessary.</p> | <p>3</p> |
| <p>Eliminate harassment? (e.g. Hate crime initiative having robust reporting mechanisms)</p> | <p>If there are organisational processes that through their implementation may cause harassment then this procedure provides an avenue to address such issues.</p> | <p>3</p> |

| | | |
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| <p>Promote good community relations?</p> <p>(e.g. engagement strategy which encourages younger people to work with old people in order to address ASB)</p> | <p>This procedure makes provision for openness and transparency and therefore implicitly aims to secure public confidence.</p> | <p>1</p> |
| <p>Promote positive attitudes towards disabled people?</p> <p>(e.g. Corporate Communications campaign using a disabled members of staff on a poster campaign)</p> | <p>Not relevant</p> | <p>1</p> |
| <p>Encourage participation of disabled people?</p> <p>(e.g. developing a specific initiative within PACT to ensure that disabled people participate)</p> | <p>Those with certain impairments may find it more difficult to make complaints which means in implementing the procedure such issues needs to be monitored.</p> | <p>3</p> |
| <p>Consider more favourable treatment of disabled people?</p> <p>(e.g. favourable treatment of disabled people in the recruitment/promotion process)</p> | <p>PSD will need to ensure that provision is made for those members of the public who have difficulties in accessing services.</p> | <p>3</p> |

| | | |
|---|--|----------|
| <p>Protect and promote human rights?</p> <p>What articles of the Human Rights Act 1998 may be engaged?</p> | <p>The procedure has made provision for actions to be proportionate and comply with Human Rights. Article 3 Inhumane or degrading treatment European Convention Article 5 Article 8 Right to Family and Private Life European Convention Article 9 Article 10 Article 11 Article 14 Prevention of discriminatory behaviour European Convention</p> | <p>3</p> |
| <p>Rights of the child</p> | <p>This needs to be monitored in relation to how processes and access to making complaints impacts on children.</p> | <p>3</p> |
| <p>Welsh language Act</p> | <p>Not relevant</p> | <p>1</p> |

4.0. Are there any aspects of the initiative, including how it is delivered, or accessed, that could contribute to inequality?

| Are there concerns that the initiative could have differential impacts on people of different...? | | Level Impact H-M-L | Extent Impact H-M-L | What evidence do you have for this? |
|---|---|--------------------------|---------------------------|--|
| 4.1 | Race | 1 | 1 | This procedure provides a process by which members of the community can complain about organisational processes that impact on them. It has been drafted in such a way that it does not aim to discriminate against anyone group. There needs to be monitoring of how accessible processes are for Individuals with disabilities e.g. hearing, sight to actually use this procedure. |
| 4.2 | Gender (including transgender) | 1 | 1 | |
| 4.3 | Disability | 3 | 3 | |
| 4.4 | Sexual Orientation | 1 | 1 | |
| 4.5 | Age | 1 | 1 | |
| 4.6 | Religious belief | 1 | 1 | |
| 4.7 | Welsh Language/2 nd Language | 1 | 1 | |

5 Does the initiative have a negative impact upon the lives of people, including members of particular communities and groups? If it does have a negative impact, what evidence can be provided that demonstrates this could be a justifiable course of action?

E.g. The use of stop and search powers under section 44 of the Terrorism Act – if it is proportionate, intelligence led and details of all stops are recorded. Although such an example may be justified under the equality legislation, the implementation of such activities will need to ensure that negative impact is minimised (a full equality impact assessment will allow us to examine how we can do this successfully)

The procedure should have a positive impact upon people's lives as it provides a mechanism for them to raise issues regarding the way our organisational processes impact on them.

Is a Full EIA required?

The answers given in this screening document have been scored on the level of relevance to Gwent Police's equality general duties, and the level and extent of impact initiative has.

The scores will determine if further consideration is need in the development of the initiative, in which affected communities will be consulted with in order to examine their concerns further and identify how Gwent Police can minimise any potential impact and also maximise Gwent policies opportunities to positively engage with our Equality Duties.

| SECTION | SCORE |
|-------------------------------------|-----------|
| Relevance to Equality Duties | 24 |
| Level of Impact to different groups | 9 |
| Extent of Impact | 9 |
| Total Score | 42 |

| Please tick the statement you agree with | |
|---|-------------------------------------|
| The initiative has scored between 22-44 and therefore has been deemed to have a low-medium relevance and impact and a Full EIA is not required, | <input checked="" type="checkbox"/> |
| The initiative has scored between 44-66 and therefore has been deemed to have a medium-high relevance and impact and a Full EIA is required, | <input type="checkbox"/> |
| The initiative has scored over 50 and therefore will require prioritisation for a full EIA | <input type="checkbox"/> |

| Community Cohesion Team | |
|---|--|
| Date Initial EIA filed | |
| Date Full EIA scheduled if required | |
| Date passed to corporate services for publication if required | |