



Home Office

POLICING GREEN PAPER

FROM THE NEIGHBOURHOOD TO THE NATIONAL: POLICING OUR COMMUNITIES TOGETHER

**Equality Impact Assessment Report
27 November 2008**



Executive Summary

This report contains a number of key findings in relation to the perceived and understood equality impact of the policing Green Paper proposals. The main equality impacts expressed were:

There was a **positive response** to the overall aims and objectives of the Green Paper in particular that of the Policing Pledge and community involvement in local decision making in relation to policing, but it was believed that more work had to be done on implementation processes to ensure the proposals transfer from the Green Paper into the reality of police and community engagement.

Positive impact of the introduction of a three-year tripartite (the Home Office, the Association of Police Authorities (APA) and the Association of Chief Police Officers (ACPO) Equality, Diversity and Human Rights Strategy for Policing and **positive impact** response to the setting of Equality Standards for Policing that supports authorities and police forces in setting local equality standards for all seven diversity strands¹, in particular in relation to recruitment, retention and progression. It was believed that community involvement in setting such standards would give the policing partners more ownership and credibility with communities.

Positive impact of reducing bureaucracy but **potential for negative impact** within some ethnic minority communities, if belief that excessive police bureaucracy of service was brought about by implementation of the recommendations of The Stephen Lawrence Inquiry Report by Judge Sir William Macpherson (referred to in this document as the Macpherson Report) and this misconception is allowed to continue (addressed through recommendations 1 and 3).

Positive impact response to the principle of the Green Paper proposals relating to directly elected members to police authorities in terms of changing the racial, faith and gender make up of police authorities. However, there were strongly expressed **negative impact** concerns from police authorities around the evidence to suggest that change was required and that the proposals would bring about any positive change, but could instead lead to loss of experience, separatist and extreme representation on the police authorities without regulation being imposed to prevent this (address through recommendations 4 and 5).

The Green Paper appeared to present equality and diversity as a stand alone issue that was only relevant to Chapter 4. This presented a negative perception that equality and diversity was not seen as a key element that ran through the whole of the Green Paper proposals (address through recommendations 1, 2 and 3).

A **negative perception** that the Home Office is disowning its responsibility to ensure the Police Service is representative of the communities it serves by moving away from national target-setting such as the race employment targets for recruitment, retention and progression and stop and search, placing responsibility for employment target setting and monitoring with local police forces, police authorities and the Her Majesty's Inspectorate of Constabulary (HMIC) (address through recommendations 1, 2 and 3).

¹ The diversity strands are: age; disability; gender; race; gender reassignment; religion or belief; and sexual orientation.

In addition the impact assessment also identified a lack of confidence in:

- HMIC to scrutinise police performance in particular from an equality and diversity perspective and also consider their ability and capacity to deliver this important and major task (address through recommendation 6).
- The “Engaging Communities in Fighting Crime” review led by Louise Casey was perceived to have ignored minority and faith community issues around lack of trust and confidence in the police service (address through recommendation 1).

Introduction

The Home Office is committed to having a police service that has the trust and confidence of all communities and a service that reflects the communities it serves. The main purpose of this equality impact assessment was to examine the proposals, as laid out in the Policing Green Paper, to see whether they have the potential to affect people differently and to identify and address real or potential inequalities resulting from the proposals.

It is not only our legal obligation under various equality legislation but also our moral obligation to do the right thing by ensuring our policies, functions and services are equality impact assessed by consulting and involving our key policing partners and external stakeholders (Annex C).

I would like to thank all the individuals and their respective organisations for giving their valuable time, experience and insight to support the Green Paper Equality Impact Assessment (EIA) process. Their contribution enabled us to complete a final EIA report that incorporated a wide and diverse set of views, experience and insight from diverse sections of our communities from within and external to the policing environment. In particular I wish to thank all the Diversity Staff Support Associations (DSSA), Staff Associations, Trade Unions, National Policing Improvement Agency (NPIA), Association of Chief Police Officers (ACPO), Association of Police Authorities (APA), Home Office colleagues, Voluntary and Professional Equality and Diversity representatives for their invaluable contribution. I particularly wish to extend my gratitude and thanks to:

- Doreen Lawrence, for her time and for her constructive contribution both in person, at various meetings and through written submission.
- Phil Pavey from the Equality and Human Rights Commission (EHRC) for his constructive and informed input.
- Glen WILLIAMS from Nottinghamshire Police who was seconded to the Home Office and played a major part in helping us to complete the equality impact assessment report.
- Anisa LUNAT, Home Office undergraduate secondment for providing her invaluable assistance in the collation and distribution of all the administrative processes involved in the Green Paper EIA process.

Maqsood Ahmad

Head of Police Equality and Diversity Policy
Home Office

Methodology

The methodology adopted for considering the EIA for the Green Paper comprised the following:

1. The identification of the proposals for the Green Paper that were circulated prior to publication on 17th July 2008 for initial discussions and consultation with DSSA, Staff Associations, APA, and NPIA and which assisted in the completion of the EIA preliminary screening process (Annex A).
2. The collation and analysis of relevant equalities legislation, reviews, recommendations and findings that already exist that identified equality impact issues relevant to the Green Paper proposals.
3. The inclusion of equality and diversity related issues into the Green Paper achieved through individual meetings and initial written submissions.
4. The identification of relevant sections of the Green Paper proposals. These were placed into a Green Paper equality impact, (EIA), grid document that allowed for the equality impact observations to be placed along side them, along with the associated colour indication of the level of equality impact expressed using the Red, Amber, and Green (RAG) system. The aim of this was to ensure the key aspects of the Green Paper proposals were recorded and then communicated coherently to all stakeholders. This also assisted in facilitating open and meaningful discussions between the policy, community and internal representatives at various levels and forums.
5. Addressing EIA requirements by consulting formally on the agreed proposals for the Green Paper through the 12-week consultation period that followed from publication through to 10th October 2008. The consultations needed to be substantial and robust, involving internal/external stakeholders and wider public communities through agencies and organisations such as: Police Diversity Support Staff Associations (DSSA); Unison; HMIC; NPIA; ACPO; community representatives, such as Doreen Lawrence; voluntary organisations; and community Independent Advisory Group (IAG) panel members.
6. Two one-day EIA seminars arranged in July 2008 to obtain qualitative data. These were attended by representatives mentioned above with Home Office officials who provided information and updates.
7. The use of feedback forms which were sent out to both stakeholders who attended, and those unable to attend, requesting their views or additional observation.
8. The collation and analysis of reports and feedback from the EIA consultations, summarising the findings and identifying the EIA issues in relation to the work-group stages of the Green Paper and placed against the relevant section of the Green Paper EIA Grid.
9. The collation and analysis of EIA issues from written submissions made to the Home Office from the consultation process undertaken between 17th July 2008 and 10th October 2008.
10. Through project and group leads identifying, acknowledging and formalising action on potential negative impact issues and concerns brought to our attention.

11. The evaluation of risks or benefits in pursuing key proposals, or not, in the published document, a Risk Log.

12. The continued review over the following three years, as required by Equality legislation.

Consultation and Involvement: Assessment and Analysis

Consultation and Involvement: Assessment and Analysis

Initial EIA written submissions received before 17th July 2008:

On the 17th March 2008 Police, Diversity Staff Support Associations, Staff Associations, NPIA and HMIC were asked to put in submissions on their thoughts on the equality and diversity impact of the Green Paper initial proposals and any potential issues they felt might arise from them. It was made clear to them that the document content was not confirmation of the final Green Paper but acted as a guideline to the areas that were to be looked at and they were to make their submission with that in mind. Further consultation would take place during the three-month consultation period during which they would be invited to make further contributions building on their submissions to date.

Key EIA issues from written submissions

The key issues from the initial written submissions centred on the following:

Recruitment, retention and progression of diversity strands in relation to gender and race were expressed as areas of concern in relation to the removal of national targets to local target setting by police authorities. It was believed that the ten-year race equality employment targets set by the Home Secretary in 1999 were not going to be met by some of the key forces. The removal of national targets in this area would make the situation worse at a time when recruitment of minority ethnic staff was even more critical. In relation to the disability strand, concerns were expressed around the use of restricted duties to sideline individuals from mainline duties and thus opportunities for progression. This was seen as a negative impact (address through recommendations 1, 2 and 3).

Concerns were expressed that some police authorities may not see the equality and diversity agenda as a high priority. In addition, it was suggested that police authorities needed to do more to attract people from diverse backgrounds to help increase trust and confidence. This was seen as a negative impact (address through recommendations 3 and 5).

Lack of confidence expressed in the ability and capacity of HMIC to robustly scrutinise police forces on equality and diversity targets. This was seen as a negative impact (address through recommendations 3 and 6).

Diversity Staff Support Associations expressed concern as to how the Green Paper proposals will bring about change in relation to the Criminal Justice System (CJS). There are perceptions that the CJS has negative attitudes towards equality and there is disproportionate representation of people from a diverse background within the system. This was seen as a negative impact (address through recommendations 1 and 2).

Although there was an overall positive reception to the aims and objectives of the Green Paper, stakeholders were not fully convinced the proposals would bring about a positive change for equality and diversity within the police service and wider criminal justice system (address through recommendations 1, 2 and 3).

Previous Reports Relevant To the Green Paper

Sir Ronnie Flanagan's independent "Review of Policing" and the "Engaging Communities in Fighting Crime" review led by Louise Casey were key cornerstones of the Green Paper proposals and as such it was important that any relevant EIA recommendations were included for consideration in this report.

Sir Ronnie Flanagan's analysis of the data established that some disproportionate or adverse impact could arise during the implementation of some of the proposed measures outlined in his Review. In response to this, the Equality Impact Assessment report of the Review recommended that specific measures be taken to remove or minimise the negative impact the Review could have on the seven strands of diversity. The Review EIA recommendations are:

1. As there are no or limited boundaries or guidelines with regards to discretion, measures need to be put in place to ensure that police officers and police staff are held to account for their actions and the public are reassured that complaints are fully investigated and appropriate action against officers and staff is seen to be transparent.
2. Action must be taken to address those possible options that might lead to an erosion of minority ethnic and female representation on police authorities. A positive action strategy needs to be formulated with an aim to increasing the representation of police authorities in line with their diverse population, this is crucial to ensuring that there is not an imbalance in terms of police authority membership and make up of staff.
3. Positive steps need to be taken to expand the role of Police Community Support Officers (PCSOs) into other permanent roles. ACPO need to work with the Home Office and NPIA to develop a career pathway, so that the service can recruit, retain and progress people from minority groups such as women and people with minority ethnic backgrounds within the police service.
4. If proposed measures to change the recording of Stop and Account are accepted, it is recommended that it is piloted and the effects of the change monitored, before complete roll out. Also, all the measures outlined in the Reducing Bureaucracy recommendation must be followed if recording of Stop and Account is to be changed.

The Green Paper comprehensively covered the issues raised by Sir Ronnie Flanagan's EIA recommendations 1, 3 and 4 (as above). However, in relation to Sir Ronnie Flanagan's recommendation 2 there was strong negative equality impact concern expressed through the Green Paper EIA consultation that had not been addressed.

Three-Month Consultation

As well as receiving additional written submissions in relation to the EIA, there was a three-month consultation period from the 17th July 2008 to 10th October 2008 to discuss various issues around the Green Paper proposals. This was also seen as an opportunity to obtain equality impact evidence from community stakeholders and additional evidence from internal stakeholders and partners. In relation to the collation of data during that period the methodology approached described above was adopted and implemented by the Police Productivity Unit, Police Equality and Diversity team. The main consultations that took place in relation to Equality and Diversity issues were:

- Monday 21st July 2008, Internal EIA consultation with representatives from Diversity Staff Support Associations (DSSA), Police Staff Associations (PSA), Association of Police Authorities (APA), National Policing Improvement Agency (NPIA), and the Home Office (HO).
- Monday 28th July 2008, external EIA consultation with representatives from voluntary sector, faith organisations and community members.
- Monday 16th September 2008, external EIA consultation on new scrutiny role of HMIC.
- Requested written submissions on the Green Paper from youth groups through the Youth Parliament and school governors at selected schools.
- Further written submissions from the British Association for Women in Policing, the Stephen Lawrence Trust, the Equality and Human Rights Commission (EHRC), the Gay Police Association (GPA) and the Association of Police Authorities (APA).
- General written submissions to the Green Paper that included equality impact issues.
- In addition and to sample a national and local forum, the EIA team members also attended the following Green Paper consultation meetings:
 - The Green Paper: “Next Steps for Collaboration” workshop held at the Police Collaboration Event at Nottingham Albert Hall Friday 5th September 2008.
 - Lancashire Police Authority Equality and Diversity Regional meeting Tuesday 7th October 2008.

“Internal” Consultation with the Police Service

The main EIA issues and concerns that came out of the meeting with representatives from DSSA, PSA, APA, NPIA, and HO from the Internal EIA consultation on Monday 21st July 2008 were:

There was general support for Home Office vision for equality and diversity and the three-year Equality, Diversity and Human Rights Strategy. This was seen as a positive impact for all the equality strands.

There was general support for minimum equality standards for policing but more information was required as to how they would incorporate local recruitment, retention and progression targets in relation to race and gender. It was felt that, even with the prospective NPIA framework to support Police Authorities in setting standards locally and an expanded 'quality control' role for HMIC, a force setting its own benchmark could not be right. At the very least it was felt that the proposed local standards should be subject to central approval, to ensure that they were meeting minimum national levels. Overall this was seen as a positive impact, with reservations.

There was an expressed lack of confidence in HMIC; the APA and local police authorities taking forward the equality and diversity agenda. This was seen as having a negative impact across all the diversity strands. (Address through recommendations 5 and 6)

Concerns were expressed that the HMIC's decision, for whatever reason, not to publish its report on its 'Duty Calls' inspection reduced confidence that it could effectively undertake the key role of robustly scrutinising police performance in relation to equality and diversity. This was seen as having a negative impact across all the equality strands. (Address through recommendations 3 and 6)

In response to representations received from EHRC and the service. HMIC subsequently published a closing commentary on the inspection on their website, circulated the chapters on the four main areas of inspection (stop and search, hate crime, staff progression, and procurement) to all forces, and contributed to workshops on the inspection at the 2008 joint national progression conference.

It was stated that directly elected police authority members,² had been carefully considered in the past and rejected. The EIA report for the Green Paper needed to recognise the potential harm to the promotion of equality if individuals representing extremist views were elected as police authority members due to low turnouts, and should have provisions to mitigate this. This was seen as having a potential negative impact across all strands of diversity and particular in relation to race (address through recommendations 4 and 5).

It was not clear how replacing numerical policing targets with just one national target to improve public confidence,³ would work. The confidence of the majority of people, who had no direct personal contact with the police service during a year, would depend on external factors such as the media and newspaper articles and thus confidence targets would be subjective as apposed to objective in terms of actual police performance. This was seen as a potential negative impact across all the strands (address through recommendations 1, 2 and 3).

In addition, concern was expressed that the progress that has been made on ethnic minority recruitment, dealing with racist incidents and racially aggravated offences would not have happened without the Police Performance Assessment Framework (PPAF) targets, and that race disproportionality in stop and search would have diminished if the PPAF target had not been abandoned at an early stage. Therefore, "scrapping" measurable national equality targets should not be undertaken unless an effective "proportionality" national target could be introduced to supplement the prospective "public confidence" one. This was seen as having a negative impact in relation to race and gender (address through recommendations 1, 2 and 3).

² Pages 32-33 of the Green Paper Chapter 1

³ Page 39 of the Green Paper Chapter 2

“Scrapping the stop and account form entirely, in favour of recording ethnicity by radio”, (pages 39 – 40 of the Green Paper) was also seen as an issue of concern. Doreen Lawrence made the point that the record form had been extended and was now taking far too long to complete, because “police forces had added all sorts of intelligence to the form to be recorded”. The Macpherson Report required only a very brief record to be given to the person stopped and searched. It was felt that it is vital that this was retained and that the streamlined process still conformed to the Macpherson Report. This was seen as a potentially negative impact in relation to race (address through recommendation 3).

It was strongly believed that the Home Office appeared to divert its responsibility for equality and diversity to other organisations (NPIA, HMIC) through the proposals in the Green Paper. This was seen as having a potentially negative impact in relation to all the strands (address through recommendation 3).

While this impact assessment was being carried out a Ministerial Steering Group has been established in response to the Home Secretary request to assess the minority ethnic recruitment, retention and progression in the police service. An assessment report has been published - “Policing Minister’s Assessment of Minority Ethnic Recruitment, Retention and Progression in the Police Service” (20 November 2008). The implementation of the assessment report recommendations will assist in overcoming the concerns expressed by internal policing partners and external stakeholders. The Minister of State for Policing, Crime and Security chairs the Steering group.

The “Engaging Communities in Fighting Crime” review led by Louise Casey appeared to be silent on issues relating to equality and diversity in its recommendations, even though the main thrust of its recommendations were around regaining public trust and confidence in the police. This was seen as having a negative impact in relation to the race and faith or belief equality strands. (address through recommendation 1).

“External” Consultation with the Communities

The main EIA issues and concerns that came out of the meeting with the external representatives from the Voluntary sector, professional Equality and Diversity agencies, Faith sector, Community sector and community based DSSA on Monday 28th July 2008 were:

The “Engaging Communities in Fighting Crime” review led by Louise Casey was seen to be silent on equality and diversity issues and showed lack of concern for minority ethnic and faith groups’ dissatisfaction with policing of communities. This was seen as a negative impact in relation to race and faith equality strands (address through recommendation 1).

A lack of confidence was expressed in HMIC, the APA and police authorities taking forward equality and diversity issues, and both organisations lack of diversity resource representation, capacity and skills sets, particularly in relation to race. This was seen as a negative impact in relation to race. (address through recommendations 3 and 6).

The Home Office appeared to be passing its responsibility for equality and diversity to other organisations (such as NPIA, HMIC). The legal aspect of such a move under legislative equality requirements was questioned in relation to proposals to move away from national to local target setting. This was seen as having a negative impact in relation to race, gender and disability. (address through recommendation 3).

Although there was a broad positive impact response to the setting of local diversity targets such as those around recruitment, retention and progression, there was concern expressed around the framework to be put in place to deal with the pragmatic issues of how this would bring about equality and diversity change.

Broad support and approval was given for the aims and objectives of the Green Paper and the three year equality, diversity and human rights strategy but more clarity was needed on the implementation of the strategy and the role policing partners (HMIC, ACPO, APA, NPIA and Home Office) will play in making this happen in reality and on an operational level. For example, how policing partners with the help of communities can prevent extremist and separatist groups becoming members of local police authorities (address through recommendations 1, 4, 5 and 6).

Consultation on HMIC Scrutiny Role

The main EIA issues and concerns that came out of the meeting with the External representatives with the Home Office on the new scrutiny Role of HMIC on Monday 16th September 2008 were:

It was stated that locally set targets were seen as a good thing, but that inspections would have to be about assessing whether the locally set targets were sufficiently ambitious. Overall, this was seen as a potentially positive impact for all the equality strands.

Comment was made that the national target should remain and that the Equality and Human Rights Commission (EHRC) did not feel they should be scrapped. This was seen as a potentially negative impact in terms of race in relation to the Home Secretary's Race Employment Targets (address through recommendations 1, 2 and 3).

There was a further issue in relation to proposed Home Office confidence target in that if this was the national target for the Home Office it should contain elements of proportionality in relation to everything the police forces do – such as stop and search, arrest rates and employment. This was seen as a potentially positive impact in relation to all the diversity strands and a way forward to counter the potentially negative impact around disproportionality as it affects Race, Faith, Disability and Gender.

It was also agreed that HMIC, as an inspectorate, was better than other inspectorates, in the public and private sector, in knowing how to scrutinise organisations' performance.

It was recognised that progress had been made by HMIC particularly after the Stephen Lawrence Inquiry for HMIC to reflect the communities it serves by appointing two assistant inspectors of constabulary to specialise in equality areas of work and support inspections. This was seen as a positive impact.

However, from the two assistant inspectors only one had remained and that post now has become vacant. There was a concern whether HMIC was going to replace the expertise and have inspectors with the experience that reflect the diverse communities the police service serves. This

concern was further compounded by the perception that HMIC did not have enough authority to push remedies through to tackle issues without interference from those police services or authorities that it inspected.

To mitigate some of the concerns expressed, the Chief Inspector of Constabulary invited independent members to a meeting and assured them that the HMIC will be appointing an Assistant Inspector of Constabulary who will lead on equality and diversity.

Police Collaboration Event

The main EIA issues and concerns that came out of the Green Paper workshops at the Police Collaboration Event held at Nottingham on Friday 5th September 2008 were:

Police authority members were concerned about the lack of evidence to show that Green Paper proposals for directly elected members would lead to greater diverse representation in Police Authorities. The lack of evidential data to support the change was seen as a negative impact in terms of confidence in why the Green Paper proposals were being put forward.⁴ In addition they also felt the direct election of Police Authority members as proposed in the paper may result in extreme representation on the authorities and the loss of experience if no safeguards were put in place. This was seen as a potentially negative impact in relation to race, gender and faith (address through recommendations 4 and 5).

APA and Local Police Authorities responses

The main EIA issues and concerns for the Association of Police Authorities (APA) were obtained from their published written response to the policing Green Paper, published in October 2008, and the Lancashire Police Authority regional meeting held at Preston on Tuesday 7th October 2008.

Many of the views and observations made in relation to the Green Paper from the Lancashire Police Authority were captured in the APA overall response to the Green paper. At the meeting in Preston, delegates commented that there needed to be a closer working relationship between the Police Authorities and Police Forces in relation to the setting of local targets, in particular around diversity representation targets. The Green Paper was seen as a good opportunity to improve the equality and diversity credentials of the APA.

The APA written response made clear that there is much in the Green Paper that the APA fully supports, such as local target setting and the recognition of police authorities roles in relation to police forces. The biggest concern for the APA, regionally and nationally, was “the potential negative impact” of “having members directly elected to police authorities”. It was stated that: -

“Direct elections would not increase the opportunity for greater equality in police authority appointments and diversity in the membership.” It was stated that it was too much to “expect that women, minority ethnic and younger members of the community and those holding down a full-time job would have the time to devote to police authority and CDRP work?” It was believed that “Direct elections might give a veneer of equality to the process, but the outcomes would probably be the same i.e. the majority of CPRs would be older, white males.”

In addition there were a number of other issues that the APA brought to our attention including:

⁴ This concern was also repeated in the APA written response to the Green Paper)

Implications for basing the green paper on the “Engaging Communities in Fighting Crime” review led by Louise Casey considering that the Review did not consider equalities or conduct an EIA.

User Satisfaction Surveys – consideration needed to be given on how young people, the most vulnerable, domestic violence victims, refugees, migrants, Asylum seekers, gypsy/travellers will be taken account of?

Annual Policing Summaries – there are accessibility issues for disabled groups, migrants, asylum seekers, refugees, gypsy travellers, and young people that need to be considered.

The Policing pledge – there are issues around attracting a diverse audience to public meetings; police authority experience of public meetings has been that meetings generally attract certain sections of society only, and these are (generally) white, middle class, older males.

The APA felt that the HMIC is not objective and when it comes to difficult messages it closes ranks with the service.

Additional Equality Impact Assessment Written Submissions from Green Paper Consultation

There were no additional EIA observations received from the written submissions made to the Green Paper during the consultation period of 17th July 2008 to 10th October 2008.

Recommendations and Measures to Mitigate Disproportionate and Adverse Impact

The recommendations set out below have been developed to mitigate disproportionate and adverse impact highlighted during the Equality Impact Assessment (EIA) process including a recommendation to develop an action plan specifically to do this.

It is important that that action is taken to address issues raised during the EIA and to show we have been able to link the EIA recommendations with new work and show proposed action developed as a result of the recent Policing Minister’s Assessment of Minority Ethnic Recruitment, Retention and Progression in the Police Service”. Two key recommendations contained in the Ministerial Assessment include the establishment of the Minority Ethnic Ministerial Steering Group and work to be taken through the three-year Equality, Diversity and Human Rights Strategy (EDHR), both aimed at driving forward initiatives to overcome barriers which hamper the progression of equality and diversity in the police service.

Recommendation 1: That the three-year tripartite Equality, Diversity and Human Rights (EDHR) Strategy is given high priority in terms its development by the Home Office and its policing partners. The EDHR strategy will provide a good opportunity to address many of the negative equality impact concerns expressed in this report including the tripartite partners’ legal requirement to carryout equality impact assessments.

Recommendation 2: The development of the minimum equality standards for policing should be undertaken in consultation with and involvement of the police staff associations, trade unions and diversity staff support associations. In addition, include the involvement of independent community members to gain ownership and credibility from all stakeholders.

Recommendation 3: The Minority Ethnic Ministerial Steering Group and Ministerial Women in Policing Group should explore the best ways of increasing trust and confidence between diverse communities and policing agencies.

Recommendation 4: Home Office to further consider the impact of directly elected membership on equality and diversity in consultation with communities and APA.

Recommendation 5: The Association of Police Authorities (APA) together with Police Authorities should proactively promote the work that they do to increase awareness of the Police Authority role with regards to working with underrepresented groups.

Recommendation 6: The National Policing Improvement Agency (NPIA) and Her Majesty's Inspectorate of Constabulary (HMIC) to promote the work they do to increase trust and confidence to deliver the Green Paper proposals to independent community members and community groups.

Recommendation 7: The Home Office Police Reform Unit in partnership with policing partners should develop the Equality Impact Assessment Action plan.

All recommendations will be overseen by the Green Paper Implementation Steering Group and progress communicated to internal and external partners through the Equality and Diversity Strategy Board, the Minority Ethnic Ministerial Steering Group and the Ministerial Women in Policing Group.

Conclusion

The overall aim of the Green Paper to “further improve policing and the ways in which it can deliver to the public” was widely accepted, but there were reservations around the implementation of the proposals; the potentially negative impact on recruitment, retention and progression of minority ethnic and diversity staff and their representation in the police service. There were also concerns around organisations that would have increased responsibilities through the proposals, in particular that of HMIC and its ability to deliver.

The three EIA consultation meetings held during the three-month Green Paper consultation period between 17th July and 10th October 2008 not only highlighted the adverse equality impact concerns but also produced ways forward as to how those adverse impacts could be reduced.

It is important that the concerns expressed through the consultation process are answered and acted on where necessary. The adverse impact assessment concerns raised are not insurmountable and ministerial groups (with membership consisting of internal policing partners and external independent stakeholders) have already taken some of these concerns on board. The two ministerial groups are:

- The Minority Ethnic Ministerial Steering Group and;
- The Ministerial Women in Policing Group.

Annex A

EQUALITY IMPACT ASSESSMENT

Police Equality Diversity Team

Police Productivity Unit, Police, Reform and Resources Directorate

Date of Screening – Initial Equality Impact Assessment	17.12.07 – 17.07.08
Name of Equality Impact Assessment Green Paper writer	Maqsood AHMAD, Police Equality and Diversity Team
Director	Stephen KERSHAW

PRELIMINARY SCREENING

POLICING GREEN PAPER	This is a consultation document that will be incorporated into existing white papers, current legislation and new policies.
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Policy Aims, Objectives & Projected Outcomes
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Policing to respond to and deliver for the public.

The police to succeed in meeting the new challenges faced in 21st century policing.

To be more open and rigorous in managing performance – raising the bar on overall expectations and bringing everyone up to the level of the best.

The Green Paper Main proposals are:

- To make it easier for the public to influence local priorities by agreeing the local elements of a new Policing Pledge, and embedding neighbourhood policing with local neighbourhood management.
- To enable local people to elect the individuals that will both Chair their local Crime and Disorder Reduction Partnership (CDRP) and form the majority on their police authority.
- To build on the historical role played by the office of constable, by ensuring all members of the workforce are able to deliver the best possible service that the public demands.
- Better deployment decisions, defining the best mix of officers, and using the approaches of Operation QUEST and workforce modernisation are needed to get the right people in the right places at the right time, to maximise efficiency, and to deliver a better service to the public.
- To make the police more responsive to local people and free them from red-tape by taking forward the Flanagan recommendations on reducing bureaucracy, and set fewer, more locally flexible targets.
- To publish the National Policing Pledge setting out what the public can expect from the police. The public will also have access to local crime information telling them how their local police are performing.
- The Home Office and HMIC will be more public about how forces are performing, and the support available to forces.
- To set out clear and robust arrangements for those forces that are consistently not performing as would be expected.
- To develop the top police leaders of tomorrow capable of meeting future challenges, by creating a recognised cadre of leaders; establish a police national leadership college; make it easier to remove poorly performing senior officers; and raise expectations on the best leaders to take on the most challenging jobs.
- To support chief constables, police forces and police authorities to tackle serious crime and terrorism and to ensure they are as efficient as possible. Review the legal and governance frameworks to ensure forces continue to collaborate to achieve these goals.
- Mandated collaboration will be considered where there is a clear operational and business imperative for a joint or consistent approach. To encourage closer collaboration as an important first step for force exploring the possibility of voluntary merger.

- The Home Office will take a more strategic role to give the police the freedom to deliver locally, but will ensure local delivery is effective by setting national minimum standards.

To clarify governance arrangements, a new model for decision-making will determine when it is right for decisions to be made at the national, regional and local level.

Will the Green paper have an impact on national or local people/staff?	YES
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the Green Paper	YES
Are there any aspects of the Green paper that could contribute to equality or inequality?	YES
Could the aims of the Green Paper be in conflict with equal opportunity, elimination of discrimination, promotion of good relations?	YES*
If this is an amendment of an existing policy, was the original policy impact assessed?	N/A **

*The answer ‘Yes’ to question 4 is qualified in that the aims of the Policing Green Paper is to deliver a better service to all sections of the public. The key issue to be aware of is that in trying to improve the performance of the police service sections of the community are not inadvertently discriminated against or disproportionately adversely affected by the strategies, policies and procedures that ensue from the Green Paper recommendations, (e.g. the setting of one national target for the Home Office, see below).

** In relation to question 5, the Green Paper is a plan for the future of policing that in itself has undergone a three month consultation period which commenced from 17th July 2008 and finished on 10th October 2008. Any alterations to policy, strategy, functions or legislation that arise from the consultations will be disseminated out to the various areas of work some of which will be part of existing legislation, policies, strategies and functions and others that will be new.

Annex B

Related reviews and Equality Impact Assessments

The collection of data for the Green Paper EIA consisted of qualitative evidence from previous reviews, written submissions and the consultations held during the consultation period. The data consisted of: -

Home Office Statistical data and publications relating to Race Targets

Pre-Green Paper consultation meetings with internal stakeholders and partners

Information obtained during the three month consultation period with internal and external stakeholders

Published reviews on the police service

The two key reviews for the Green Paper were: -

Flanagan, Sir Ronnie (2008) The Review of Policing: Final Report:

http://police.homeoffice.gov.uk/publications/police-reform/Review_of_policing_final_report/

Casey, Louise (2008) Engaging Communities in Fighting Crime: A Review by Louise Casey. London: Cabinet Office

<http://www.cabinetoffice.gov.uk./crime.aspx>

In relation to Sir Ronnie Flanagan's report an Equality Impact Assessment was completed and published along side the final report.

Flanagan, Sir Ronnie (2008) - **The Review of Policing:** Equality Impact Assessment Report.

http://police.homeoffice.gov.uk/publications/police-reform/Review_of_policing_final_report/revieweiareport

The Macpherson Report stemming from the Stephen Lawrence Inquiry. <http://www.archive.official-documents.co.uk/document/cm42/4262/4262.htm> <http://www.archive.official-documents.co.uk/document/cm42/4262/sli-00.htm>

The Home Secretary's Annual Race Employment Targets from 1999 to 2008. <http://police.homeoffice.gov.uk/publications/equality-diversity/race/race-employment-targets-report>

National Association of Muslim Police / DEMOS Survey into Policing in England, Wales and Scotland October 2008.

Annex C

List of Consultees

Doreen Lawrence – Independent Chair of Post Lawrence Project Group – Trust and Confidence

Rev Nims Obunge - The Peace Alliance

Phil Pavey - Equality and Human Rights Commission, EHRC

Jamil Akhtar - Kirklees Racial Equality Council

Iqbal Bhana - Independent Chair, Post Lawrence Project Group – Racist Incidents

Kwami Agbadza - 1990 Trust

Koku Adomdza - 1990 Trust

Hugh Chambers - London Borough of Tower Hamlets

Jagdeep Passan - Stop Hate UK

Rokhsana Fiaz - Change Institute

Ellie Bird - British Association for Women in Policing, British Transport Police

Ron Lawrence - Notts BPA/ Regional Black Police Association

Gary Godden - Notts BPA/ Regional Black Police Association

Marie Abijah Liburd - The Chase Neighbourhood Centre, Robin Hood Chase, St Ann's, Nottingham

Suseela Yesudian-Storfjell - Aditya V. Birla India Centre

Mustafizur Rahman - Bangladesh Centre

Ron Frater - Northamptonshire Police Constabulary

Erinna Bell - Charisma - Manchester

Dilip AMIN – Black and Minority Ethnic Superintendents' Network

Liz Owsley - British Association for Women in Policing

Everett Henry – National Policing Improvement Agency

Dal Babu - National Association of Muslim Police

Alex Protts - National Disabled Police Association

Michael Pearson - Police Federation

Tom Tyler - Association of Police Authorities

Ray Powell – National Policing Improvement Agency

Ahmed Sasso - Hampshire Police

Adil Khan - Humberside Police

Maninder Desoura - Metropolitan Hindu Police Association

Vic Coding - Gay Police Association

Ian Gordon - Christian Police Association

Fiaz Choudhary - Metropolitan Association of Muslim Police Officers

Andy Garrett - Disabled Staff Association

Mandy Wynn – Her majesty’s Inspectorate of Constabulary (HMIC)

Lee- Jane Yates – MPS Chinese Association

Ann Middleton - MPS Association of Senior Female Police Staff

Juliet Simmons - Devon & Cornwall Constabulary

Mat Baggott – Christen Police Association

Annex D

Anti-discrimination Legislation

The Sex Discrimination Act 1975 as amended by the Equality Act 2006

The statutory duties of the Race Relations Amendment Act 2000

The Disability Discrimination Amendment Act 1995 as amended by the Disabilities Discrimination Act 2005.

Human Rights Act 1998

Employment Equality (Sexual Orientation) Regulations 2003

Employment Equality (Religion & Belief) Regulations 2003

Employment Equality (Age) Regulations 2006

Gender Recognition Act 2004.