



# **EQUALITY SCHEME**

**2008 - 2010**

If you would like a copy of this document in another format or language please contact the Equality and Diversity Department on 08452 777 444.

# **DEVON & CORNWALL CONSTABULARY EQUALITY SCHEME**

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## **FOREWORD**

This integrated equality scheme is designed to draw together the strands of the equality legislation that we have been working towards through our Race, Gender and Disability equality schemes over a period of years. Our intention is to be a top performing force and I believe that the time is right to look at every aspect of our work and to ensure that we promote equality in everything that we do.

I hold the national Race and Diversity portfolio for the Association of Chief Police Officers (ACPO). I am very aware of the national impact that can arise from a local incident and that a person's sense of community may well extend beyond city, county or national boundaries. It is for this reason that I believe the neighbourhood policing style needs to include focused police work with communities who are in the geographic minority. This scheme sets out how we have previously tackled this in our provision of policing services and how we plan to improve on our achievements to date.

Devon and Cornwall Police directly employs around 6500 people and indirectly affects many more through our procurement of catering, transport and other services. This integrated equality scheme and its implementation within this organisation will ensure that, as a major employer in the area, we are fully committed to providing equality of opportunity to our work force. This is of the utmost importance to me as I recognise that, as provider of policing services, all of our business is done through our staff and that the way in which we treat our staff will directly affect the way in which they deliver services.

We have approached our equality commitments through a single integrated scheme for over a year and have decided to continue to do this in readiness for a single Equality Act. We will work hard with all of the communities we serve as well as our staff to seek specific feedback on the important changes that we are making. I encourage you to make contact with us and let us what you think about this single integrated equality scheme so that we can continue to refine and develop it.

Stephen Otter  
Chief Constable

## **VISION, MISSION & VALUES**

### **OUR MISSION**

**Building safer communities together**

### **OUR VISION**

To be amongst the top ten performing Forces out of the 43 in England and Wales in order to provide a quality service to the people of Devon, Cornwall and the Isles of Scilly.

### **OUR VALUES**

- Honesty
- Integrity
- Fairness and Respect
- Trust
- Courage

### **OUR STRATEGIC THEMES**

**Operational Delivery** - delivering services that are accessible, responsive and meet the needs of all communities

**People and Culture** - building an inclusive and supportive working environment that encourages development and progression for all staff

**Organisational Processes** - embedding equality into organisational processes and the management of performance

### **OUR STANDARDS**

**We will:**

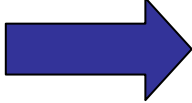

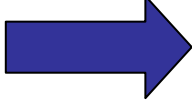

1. Put people first in the policing service we provide

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2. Always endeavour to deliver a high-quality policing service
3. Listen to you carefully, try to understand your needs and what matters to you most
4. Tell you what we can do and be honest about what we are unable to do
5. Be clear about what actions we are going to take and discuss those with you
6. Maintain an agreed level of regular contact with you
7. Treat you politely, professionally and with dignity and respect at all times
8. Welcome feedback from you about the policing service we provide
9. Effectively communicate and consult with you
10. Conform to national policing and other relevant standards

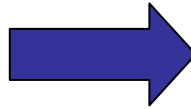
These standards will apply to the policing service we deliver to the public and the customer service we provide to our own staff.

### **THE DEVON & CORNWALL WAY – PRINCIPLES FOR THE WAY WE DO THINGS:**

- |  |   |  |
|--|---|--|
| 1. Get things right first time and only do it once   |  | Getting things right first time to meet people's needs will avoid duplication, save time and money and set standards for others to work to |
| 2. Work to an agreed corporate standard and identity |  | This will improve our reputation, ensure consistent standards of working, set good practice and establish boundaries                       |
| 3. Work to agreed performance targets                |  | Hit performance targets in the most direct and timely way  |
| 4. Put the customer first                            |  | Ensure people are at the heart of  |

everything we do through excellent customer service

5. Solve problems at initial contact



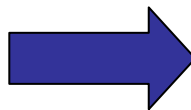
To improve customer satisfaction, reduce costs and increase efficiency

6. Plan ahead



Look towards future objectives and plan how to get there

7. Respect one another



Treat people how we know they wish to be treated

**Our people will:**

- Work together as one team and all contribute to the vision
- Be valued, supported and empowered to deliver an excellent service
- Be trained and resourced to deliver a more people focused service
- Be more representative of the communities that live, work in or visit Devon, Cornwall and the Isles of Scilly
- Demonstrate high standards of integrity, personal and professional behaviour
- Be part of a learning organisation
- Be given every opportunity to maximise their potential and individual contribution to the organisation
- Work in a safe and healthy environment where they feel comfortable, confident and cared for, enabling them to be at their best
- Have a clear idea of the organisation's expectations of them
- Have clarity about their role, responsibilities, accountability and delegated authority

## INTRODUCTION

The world around us is changing and policing has to respond and adapt to those changes in order to continue to protect society and provide quality services that meet the different needs of all our communities. Policing has undergone a transformation over recent years. It has responded to changes in society, rising public expectations, the needs of new and emerging communities as well as the impact of globalisation, technology and international terrorism. Effective policing is vitally important to all our lives and it is central to protecting the rights and freedoms that underpin our society.

In July 2008 the policing green paper<sup>1</sup> placed emphasis on local responsibility and accountability, reducing bureaucracy and providing greater freedom and flexibility for the police service. The freedom and flexibility to exercise discretion and professional judgement can only balance the requirement to demonstrate fairness and ensure accountability if there is a real commitment to openness and transparency.

Equality and Human Rights are central to the delivery of excellence in public services. This is particularly true for Devon and Cornwall Police, which is charged with the responsibility of preserving life and protecting our communities from harm. A fairer society benefits everyone, and the police service has a key role to play in promoting equality and human rights and tackling discrimination which in turn creates greater community confidence in the police. This aim of creating greater confidence in the police is the primary vision of this Scheme. The Scheme will be monitored by using the Equality Standard for the Police Service, when it is launched in December 2009, as a self-assessment of our progress that will be verified by the Police Authority and open to public scrutiny.

Devon and Cornwall Constabulary's Integrated Equality Scheme sets out our commitment to fairness and equality and the actions we will take to ensure that our services meet the needs of all communities. This Scheme outlines how we will meet our statutory and social responsibilities to promote equality in all of areas of work. It sets the standard for how our communities and staff can expect to be treated and

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<sup>1</sup> <http://police.homeoffice.gov.uk/police-reform/policegp/>

provides the framework through which we drive change and deliver improvements in equality and diversity across all areas of our business.

As a public authority we have statutory responsibilities under existing legislation to promote equality with regard to disability, gender and race. These legal responsibilities are referred to as the general duty to promote equality. We also have a number of specific duties which set out some of the steps that we need to take to help us meet the general duty. This scheme sets out what we will do to meet the general and specific duties and includes the work we are doing to combat discrimination and promote equality for other groups and particularly with regard to age, religion & belief and sexual orientation.

In the years since the publication of the Stephen Lawrence Inquiry the Constabulary has been working hard to build relationships that enable us to listen to and learn from the experience of our diverse communities<sup>2</sup>. We have established teams in each Basic Command Unit that work closely with diverse communities building trust and confidence and ensuring that their concerns are heard and addressed through our neighbourhood policing structures. The Constabulary recognises that successful organisations know that a diverse workforce is an essential element of their success. We police an increasingly diverse society and therefore we need a workforce that can build trust and confidence and gain intelligence and information from all the communities that make up this country. We need a workforce that can identify and respond to the different needs within communities, working with community members to tackle their concerns and to build safer and stronger neighbourhoods. The central importance of equality and diversity is recognised and has been built into our new vision and strategy.

Some of the ways in which we have worked towards embedding diversity throughout the organisation in 2008 include:

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<sup>2</sup> We use the term 'diverse communities' to refer to those groups and communities that are identified as different from the majority of people in a given area by virtue of such factors as race, religion, sexual orientation, age, gender disability or other form of social exclusion. It is recognised that diverse communities may well be "hard to hear" by the police because of their dispersed locations or because of mistrust of the police.

- Integration of equality and diversity into the Neighbourhood Policing framework. This has included a review of the role and function of diversity teams within BCUs and their development into Diverse Communities Teams. We have established PACT<sup>3</sup> community engagement processes with a range of diverse communities
- A programme of events promoting equality and diversity within the workplace and in the community including our participation in Truro, Brighton, Cardiff and Plymouth Pride; Exeter, North Devon & Plymouth Respect, and displays to mark LGBT & Black History months
- Work with community partners to develop and implement a 999 text reporting system for the deaf
- The development of a regular equality monitoring report addressing both service delivery and employment issues and inclusion of equality issues within our regular performance meetings
- Operations Department Open Days which provide the opportunity for female officers to learn about specialist roles and opportunities within the Operations department
- Corporate support for our staff support associations. The Black Police Association, The Gay Police Association, The Christian Police Association, the Women in Policing Network and the Force Disability Forum
- The continuation of the Springboard and Navigator personal development programmes supporting the development of staff in non-managerial roles
- A significant programme of work to increase of the satisfaction of victims of racist incidents and BME victims of crime
- The introduction of a new workplace assessment programme to ensure that our staff are attaining National Occupational Standards for Equality and Diversity and receive a bespoke training package to suit their personal development needs.

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<sup>3</sup> Partners & Communities Together

The Constabulary recognises that, whilst significant progress has been made, there is still much to do if we are to meet the needs of all communities and provide fair and appropriate treatment to all staff, service users and communities. Our Equality Scheme will provide us with the framework to drive change and hold people to account for delivering on our commitment to embrace equality and diversity throughout the organisation.

## LEGISLATIVE FRAMEWORK

The development of legislation to promote equality and combat discrimination can be traced back to November 1965 when the first Race Relations Act was passed. In the years following the publication of the Macpherson Inquiry into the murder of Stephen Lawrence saw the introduction of a range of new legislation which extends the protection from discrimination.

As a public authority we have legal responsibilities to tackle discrimination and promote equality on the grounds of disability, gender and race. These responsibilities are referred to as the general duties and their purpose is to ensure that we consider equality in everything we do. The race equality duty was introduced in the **Race Relations (Amendment Act) 2000**. It was a direct result of the Stephen Lawrence Inquiry which led to the recognition of the potential for institutional discrimination in the policies and actions of public sector organisations. The disability equality duty was introduced in the **Disability Discrimination Act 2005** which strengthened and extended previous legislation. The gender equality duty came into force in April 2007 and was introduced in the **Equality Act 2006**. In addition to the general duties the legislation introduced a number of specific duties which set out the arrangements that public authorities need to have in place in order to meet the general duties.

We have outlined below all of the general duties. We have numbered the duties so that we can demonstrate in our action plan how our actions will enable us to meet our legislative responsibilities.

### **Disability Equality Duty**

1. Eliminate unlawful discrimination
2. Eliminate harassment of disabled people that is related to their disabilities
3. Promote equality of opportunities between disabled people and others
4. Promote positive attitudes towards disabled people
5. Encourage the participation of disabled people in public life
6. Take steps to take account of a disabled person's disabilities even where that involves treating them more favourable than others

### **Gender Equality Duty**

7. Eliminate unlawful discrimination (including on the basis of gender reassignment)
8. Eliminate unlawful harassment (including on the grounds of gender reassignment)
9. Promote equality of opportunity between men and women

### **Race Equality Duty**

10. Eliminate unlawful discrimination
11. Eliminate unlawful harassment
12. Promote equality of opportunity between people of different racial groups

We have outlined below all of the specific duties. We have given each of the duties a letter so that we can demonstrate in our action plan how our actions will enable us to meet our legislative responsibilities.

### **Disability Equality Duty**

- A. Prepare and publish a Disability Equality Scheme setting out how the Constabulary will meet its general and specific duties.

- B. Involve disabled people in producing the Scheme and the development of a three-year Action Plan, which will show the priorities for action, and development.
- C. Identify how the Constabulary will analyse evidence to inform its actions and track the progress of these actions.
- D. Take the steps that are set out in the scheme (the action plan).
- E. Set out in the Scheme how the Force will assess the impact of existing and proposed activities on disabled people
- F. Report on progress every year.
- G. After every 3 years review, revise and republish the Scheme

### **Gender Equality Duty**

- H. Prepare and publish a gender equality scheme, showing how we will meet the general and specific duties and setting out our gender equality objectives
- I. Consider the need to include objectives to address the causes of any gender pay gap
- J. Gather and use information on how our policies and practices affect gender equality in the workforce and in the delivery of services
- K. Consult stakeholders and take account of relevant information in order to determine our gender equality objectives
- L. Assess the impact of our current and proposed policies and practices on gender equality
- M. Implement the actions set out in our scheme within three years, unless it is unreasonable or impracticable to do so
- N. Report against the scheme every year and review the scheme at least every three years.

### **Race Equality Duty**

- O. Prepare and publish a race equality scheme setting out how the Constabulary intends to meet the general and specific duties
- P. Carry out an assessment of functions, policies and procedures for relevance to the general duty and review this assessment within each period of three years
- Q. Assess and consult on the likely impact of proposed policies for the promotion of race equality
- R. Monitor policies for any adverse impact on the promotion of race equality
- S. Publish the results of such assessments, consultation and monitoring
- T. Ensure public access to the information and services provided
- U. Train staff in connection with the duties imposed by the Race relations(Amendment) Act
- V. Monitor, by reference to racial group, the numbers of staff in post and applicants for employment, training and promotion.
- W. Monitor, by reference to racial group, the numbers of staff who receive training, benefit or sufferer detriment as a result of performance assessment procedures, are involved in grievance procedures; are the subject of disciplinary procedures or cease employment.

### **Other Legislative Responsibilities**

The Employment Equality (Sexual Orientation) Regulations 2003 outlaw direct and indirect discrimination in all aspects of employment and vocational training on the grounds of sexual orientation. It is also unlawful to subject person to harassment or victimisation on the grounds of their actual or perceived sexual orientation.

The Equality Act (Sexual Orientation) Regulations 2007 makes it unlawful for the Constabulary to discriminate on the grounds of sexual orientation by:

- Refusing to provide a person with goods, facilities or service if they would normally do so

- Providing goods, facilities or services of an inferior quality rather than those that would normally be provided, or in a less favourable manner, or on less favourable terms.

The Employment Equality (Religion & Belief Regulations 2003) apply to all aspects of employment and vocational training. The regulations make it unlawful to discriminate directly or indirectly against anyone on the grounds of their religion or belief. It is also unlawful to subject a person to harassment or victimisation.

Part 2 of the Equality Act 2006 makes it unlawful for the Constabulary to discriminate on the grounds of religion and belief by:

- Refusing to provide a person with goods, facilities or service if they would normally do so
- Providing goods, facilities or services of an inferior quality rather than those that would normally be provided, or in a less favourable manner, or on less favourable terms.

The Employment Equality (Age) Regulations 2006 make it unlawful to discriminate against workers, employees, job seekers and trainees because of their age. The regulations prohibit discrimination in recruitment, terms and conditions, promotions, transfers, dismissals and training. The regulations apply to police officers.

## **DEVON & CORNWALL CONSTABULARY**

The Devon & Cornwall Constabulary extends 180 miles from the Dorset and Somerset borders in the East to the Isles of Scilly in the West, a coastline of 550 miles. The Constabulary serves a resident population of 1.6 million across two counties and three unitary councils. The area has a thriving tourist industry welcoming 12 million visitors annually. The ethnic minority population was recorded as 18,400 in the 2001 census which represents 1.2% of the total population. The largest ethnic minority group in Devon is the Chinese community at 0.2% of the total population. In Cornwall people of mixed heritage make up 0.2% of the population. Since the 2001 census new communities have moved into the area as result of government policy on the dispersal

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of asylum seekers and European Union enlargement. The area also experiences significant numbers of gypsy and traveller groups especially during the summer.

The Constabulary is divided into the following 3 Basic Command Units or BCU's,

- Cornwall & Isle of Scilly
- Plymouth
- Devon

These three areas are divided further into sectors and neighbourhood beats. Each neighbourhood has a team, managed by a police sergeant, which is dedicated to tackling crime, improving the quality of life and providing reassurance to that community. The team is a visible, accessible and accountable resource for the area it polices. The teams are made up of a combination of neighbourhood beat managers (police officers), police community support officers (PCSOs) and Special Constabulary officers. Neighbourhood policing puts community issues and priorities at the heart of our policing style. By listening to each community's unique needs and concerns we are able to ensure that the right resources are used in the right places and at the right time.

Devon & Cornwall Constabulary now has more resources dedicated to frontline policing than ever, with 3,500 police officers, 550 Special Constables and over 350 PCSOs.

Neighbourhood policing teams exist to;

- Provide a familiar, visible and known uniform presence
- Provide an accessible and high quality service that reflects the needs of the local community
- Gather local intelligence on crime and criminals
- Attend reported crimes
- Reduce anti-social behaviour and crime

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- Work with partner agencies and the community to identify and resolve community problems
- Work with schools, hospitals, local businesses and other community groups
- Providing personal safety and crime prevention advice

For more information on what neighbourhood teams do and the names of your local team please visit our website at <http://www.devon-cornwall.police.uk/Pages/Default.aspx>

Additional professional expertise is provided to the BCU's by a number of support departments including:

- Call management and communications
- Criminal justice
- Crime
- Operations
- Buildings and Estates
- Finance
- Human Resources and Training
- Information Communication Technology
- Legal Services
- Procurement
- Professional Standards
- Performance
- Transport Services

## **THE MEETING STRUCTURE**

The governance structure of the force is given at APPENDIX A

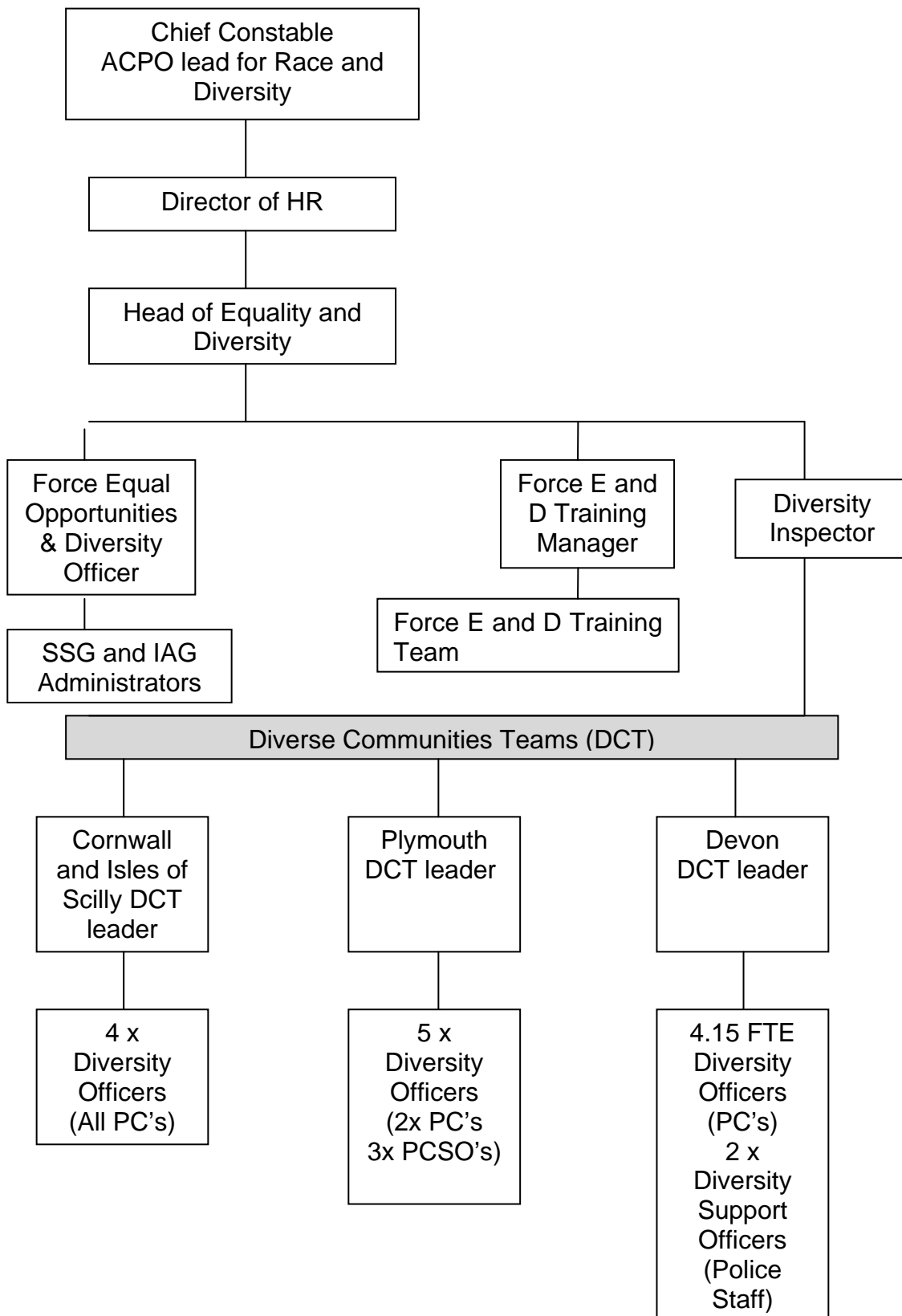
## **THE EQUALITY AND DIVERSITY UNIT**

The Force recognises that equality and diversity affects everything it does. A specialist Equality and Diversity Unit within the HR Department works closely with BCUs and

departments to improve the way the organisation addresses equality and diversity issues. The Diversity Strategy (APPENDIX B) sets out our clear strategic priorities across all areas of diversity including age, disability, faith, gender, race and sexual orientation. This strategy is under review to ensure that there is a clear line from the new National ACPO Equality, Diversity and Human Rights Strategy.

The Equality and Diversity unit consists of a team of 28 staff based at various locations across the force. The unit is headed by a Chief Inspector who is head of profession for all diversity staff and provides specialist and professional expertise and guidance on equality and diversity issues. The Organisational Support team consists of an equal opportunities officer and diversity officer, a staff support group administrator and an Independent Advisory Group administrator. An Inspector heads the diverse communities' team and they operate in a similar way to the geographic neighbourhood teams. The team has a key role in building trust and confidence through liaison and outreach work with 'hard to hear' communities. This is in recognition of the fact that members of diverse communities may not be present in sufficient numbers within any geographic community for their specific needs to be heard or acted upon. Staff work closely with patrol officers and the geographic neighbourhood teams who deliver policing services to local communities. There is also a force Equality and Diversity Training Team who deliver the force training programme across the area as closely as possible to where operational staff work. This reduces the time spent by operational staff away from their front line duties.

The structure of the equality and diversity unit is set out below



## **STRATEGIC PRIORITIES**

The strategic priorities for Devon & Cornwall Constabulary are informed by a variety of performance indicators. The Local Policing Plan for 2007 – 2010<sup>4</sup> seeks to balance the needs and priorities of the communities of Devon and Cornwall with the national policing priorities set by government in the National Community Safety Plan 2008 –11<sup>5</sup>

As set out in the Local Policing Plan the strategic priorities are;

- Providing services to meet the needs of our citizens
- Embracing equality and diversity throughout the organisation
- Empowering and valuing our staff
- Transforming our business to more effective and efficient
- Delivering our services to national policing standards

## **MEETING THE GENERAL DUTIES**

### **Discrimination**

Unlawful discrimination is discrimination defined as unlawful under the various equality legislation and includes:

- Direct and indirect discrimination on grounds of age, disability, race, religion and belief, sex and sexual orientation
- Discrimination on the grounds of pregnancy and maternity leave
- Discrimination on the grounds of gender reassignment
- Direct and indirect discrimination against married persons and civil partners
- Victimisation

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<sup>4</sup> Devon & Cornwall Constabulary Strategic Plan 2007-2010 <http://www.dcpa.police.uk/police-plan/performance/index.asp>

<sup>5</sup> <http://www.crimereduction.homeoffice.gov.uk/crimereduction015.htm>

- Harassment (including harassment on the grounds of disability, gender reassignment, race, religion, sex or sexual orientation)

Devon and Cornwall Constabulary has a range of policies and procedures in place that ensure compliance with our statutory responsibilities in this area. These policies govern not only our employment practice but also the service that we provide to the public. These principles are also enshrined in the Misconduct Procedure which states:

“Police officers act with fairness and impartiality. They do not discriminate unlawfully on the grounds of sex, race, colour, language, religion or belief, political or other opinion, national or social origin, association with a national minority, disability, age, sexual orientation, property, birth, or other status.”

Fairness at Work policy and procedures are in place and are well utilised. In 2008 the Constabulary received a total of 9 Employment Tribunal Claims. The level of complaints has highlighted the need to build the capacity of our managers to effectively manage a diverse workforce.

Following the introduction of the Gender Reassignment Act in 2004 we reviewed our policies to ensure compliance with legislative requirements. We have adopted the ACPO Guidance on Gender Recognition Act 2004 and have provided training for our custody staff to ensure that they can appropriately address issues that may arise in relation to searching of detainees and custody.

We conducted a review of policies and practices following the introduction of the Civil Partnership Act in 2004. This has ensured that any benefits or requirements in respect of terms and conditions of employment apply equally to married and civil partners. Work is ongoing in this area. It has also involved us in reviewing our documentation and forms to ensure that language and terms are appropriate and comply with equality requirements.

The Constabulary has undertaken a review of policies and practices to take account of the introduction of the Employment Equality (Age) Regulations 2006, Part 2 of the Equality Act 2006 in respect of religion and belief, and the Equality Act (Sexual Orientation) Regulations 2007. We have revised our policies to take account of the

new legislative requirements and have produced guidance for all staff and officers on the new legislation.

## **Harassment**

The Constabulary has a strong commitment to eliminating harassment and sexual harassment both through our role as a police force and as an employer. As a police force we have an important role to play in protecting members of the public from harassment and in utilising the law to tackle harassment. This commitment must also be reflected in our internal practices and standards. Incidences of harassment are taken seriously and we are mindful of the findings of the Morris Enquiry and the Home Office Review of the Impact of the Stephen Lawrence Inquiry. These identified a predominantly male, heterosexist culture within the Police Service that contributed to a widespread experience of exclusion and discrimination by women and minority staff in a number of police forces. The Constabulary is conscious that these experiences frequently go unreported and unacknowledged.

## **Equal Pay Act 1970**

The Equal Pay Act 1970 provides individuals with a right to the same contractual pay and benefits as a person of the opposite sex in the same employment if they are doing:

- Like work; or
- Work rated as equivalent under an analytical job evaluation study; or
- Work that is likely to be of equal value

Devon and Cornwall Constabulary is committed to identifying and addressing the causes of any gender pay imbalance and the requirement to do this is built into our Human Resource Strategy. We have established an Interim Grading Panel which utilises a bench marking approach to determine the grading for new posts and to deal with any grading issues related to equal pay. We have introduced a finance and human resource management information system. This allows the monitoring and analysis of data relating to pay and benefits. At present we review access to additional benefits such as bonus payments, special priority payments, and competency related

threshold payments and analyse the data to identify any gender based disproportionality.

## **DEVELOPING THE SCHEME**

Devon & Cornwall Constabulary is committed to encouraging the participation of diverse communities and we have a wider range of established mechanisms for ongoing involvement and consultation. These range from personal interaction with our diverse communities' team to more structured engagement through our Independent Advisory Group. In order to help develop the Scheme and provide guidance we established an action learning set of internal experts. This action learning set includes representatives from across the organisation including equality & diversity, human resources, learning and development, legal services, operational policing, and staff associations. The ALS helps us to review the progress that we had made through our existing equality schemes and to identify priorities for the future.

This Equality Scheme builds on the work that we have done to develop our Disability, Gender and Race Equality Schemes. Our starting point has been the priorities that have been identified through the analysis and consultation that underpinned the development of our Disability and Gender Equality Schemes. We have reviewed our Disability, Gender and Race Equality Action Plans and have incorporated outstanding work into the action plan for last years Equality Scheme. The Constabulary is a field trial force for the new national Equality Standard for the Police Service, being developed by the National Police Improvement Agency (NPIA), ahead of the formal launch of the Standard in December 2009. All Forces will assess themselves using the Equality Standard after the launch date. As a consequence of this work the Disability and Gender Equality Scheme recommendations have been placed on hold. Once the Standard has been launched these recommendations will be cross-referenced to the new key measures within the Standard to ensure that the Equality Scheme recommendations are brought even further into mainstream performance monitoring.

We carried out a programme of consultation and involvement. This included:

- Publication on the force website
- Consultation with our Independent Advisory Groups
- Follow up events in BCUs through our diverse communities teams to seek feedback from the Key Individual Networks that exist
- Commissioned advice from the Race Equality Councils, and key groups such as the Intercom Trust and Living Options
- Specific consultation through PACT meetings with diverse communities
- Feedback from our staff support groups. The Black Police Association, The Christian Police Association, the Women in Policing Network, the Gay Police Association and the Force Disability Forum
- Feedback from public sector peer agencies within for example the Devon Equality Partnership

We have acted on the ongoing feedback we receive through these means to update this Integrated Equality Scheme for 2009/2010. It is our intention to review the scheme again in June 2010 to take account of the Equality Bill.

## **EQUALITY OUTCOMES**

The purpose of an equality scheme is to fundamentally change the way in which we do things and to ensure that we think about equality in everything we do. Our ongoing consultation with individuals from a range of diverse communities reveals that they want to be;

- Listened to
- Treated with Respect
- Able to access our services in the way that they need to

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- Kept informed
- Confident that we use our powers fairly
- Safe in the places they live and work

Communities also told us that in their experience we do not always:

- Listen to their concerns
- Treat them fairly and with respect
- Understand their experience
- Make sure that they know about and can use our services
- Keep them informed
- Deal effectively with the issues that affect them

In developing this scheme we have tried to ensure that the priorities we set and that the actions we take will make a real difference in these areas. The monitoring data and information that we collect will help us to assess our progress and we will be checking with communities if our actions are making a difference. Evidence of progress will include:

- Increased levels of satisfaction amongst diverse communities
- Improved links and communication with different communities
- Increased trust and confidence in reporting crime and specifically in reporting hate crime
- Increased willingness to provide information
- Increased confidence in the Police
- A proportionate level of complaints

## **EQUALITY OBJECTIVES**

In order to identify what we needed to do to meet our responsibilities under the equality duties and to deliver outcomes for communities we undertook a gap analysis across key areas of our functions. We also looked at and updated our Equality Strategy. The reviewed strategy, Which takes into account the new national ACPO Equality Diversity and Human Rights strategy is currently out with communities and staff for consultation. The continuing objectives set out below include outstanding objectives from our disability, gender and race equality schemes.

- Establish a range of effective community engagement mechanisms with diverse communities as part of the PACT process.
- Ensure that the specific priorities of diverse communities are addressed through the neighbourhood policing processes
- Continue to maximise the benefits from the new IAG structure which we created in 2009
- Develop the role of the Critical Incident Working Group in providing independent advice to Senior Investigating Officers
- Develop monitoring processes and performance indicators to meet the general and specific equality duties. Use data to identify equality priorities and to review progress
- Ensure shared service agreements meet our responsibilities under the equality duty
- Review and revise our processes for the equality audit of policies
- Review our contract & tendering process and incorporate equality impact assessment into the development of tender specifications
- Embed equality impact assessment into our performance, planning, review and inspections process
- Embed Equality Impact Assessment into our business change process
- Deliver a programme of diversity events in communities and the Constabulary

- Improve the accessibility of reporting of crime for members of diverse communities
- Develop an implement mechanisms for monitoring of disability, faith and sexual orientation in employment
- Regularly analyse monitoring data in employment and address disproportionality
- Implement a mentoring scheme for underrepresented groups
- Ensure that all staff receive training in line with the requirements of the Police Race & Diversity learning & Development Programme

### **Priorities for Disability Equality**

- Ensure that information provided by the Constabulary is available in alternative formats
- Undertake access audits on high priority buildings as part of a x year strategy to make sure that all our buildings are accessible
- Ensure that the Constabulary's web site is accessible for people with disabilities
- Review the accessibility of station enquiry offices including the telephones for out of hour's access to police stations.
- Ensure that telephone enquiry centre is able to provide up to date and appropriate information about disability access for all police stations
- Encourage the participation of people with disabilities in consultation and involvement events
- Work with community organisations to promote the reporting of hate crime affecting people with disabilities
- Exceed 94% of disabled victims who are satisfied with the ease of contacting someone who could assist
- Increase the confidence in and satisfaction with police service amongst people with disabilities

## Version 2

- Develop and implement an effective reasonable adjustments policy
- Develop and implement opportunities for work experience for people with disabilities

### **Gender Equality Objectives**

- Deliver services that meet the different and specific needs of men and women and transsexual people.
- Develop a programme of positive action to address gender inequalities in recruitment, retention and progression. Identify and address any areas of occupational segregation in relation to ranks, roles and specialist functions
- Ensure that our part time and flexible working policies and practices are implemented effectively across all our functions and working locations
- Conduct an equal pay review to ensure that there is no gender inequality in respect of pay for women and men doing work of equal value.
- Provide a working environment and equipment that is fit for purpose, suitable and appropriate for the different requirements of women and men and that safeguards the dignity of all of our staff and officers.
- Incorporate the long term aims of the Gender Agenda 2 Programme into our Human Resource Strategy
- Increase the satisfaction rates of men and women that are victims of domestic abuse
- Exceed a sanction detection rate of 50% for domestic abuse
- Exceed a sanction detection rate of 30% for sexual offences
- Host the Women in Policing Conference 2009

### **Priorities for Race Equality**

- Exceed 86% of victims of racist incidents who are satisfied with the overall service provided by the police.
- Increase the reporting of hate crime by migrant worker, asylum seeker and refugee and gypsy and traveller communities
- Work with local authorities to enable them to implement the recommendations from the Gypsy & Traveller Housing Needs Assessments for Devon & Cornwall
- Ensure that the use of police powers<sup>6</sup> is monitored by ethnicity and that regular analysis is undertaken to identify disproportionality which is then addressed through the performance process.
- Increase the confidence in and satisfaction with police service amongst black and minority ethnic people
- Review our interpretation and translation provision to ensure that it meets the needs of communities
- Increase the reporting of domestic abuse by black and minority ethnic communities

### **Priorities for Age, Faith, Sexual Orientation**

We are looking to identify additional objectives through the consultation process  
However we are working to develop objectives around;

- Increasing reporting of homophobic and islamophobic hate crime
- Same sex domestic abuse
- Policing of the public sex environment
- Faith rooms in police premises
- Review of all linked grades / review of pay grades in line with age regulations

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<sup>6</sup> Specifically Stop & Account, Stop & Search, Arrest, Caution, Detention, & PND

- Disproportionality in operational policing delivery - e.g young men as victims of crime and being subjected to stop and search.

## CONSULTATION & INVOLVEMENT

The central aim of the national Neighbourhood Policing Programme is to put communities – their needs, their issues and their priorities – at the heart of local policing. We welcome this and are working through our Diverse Community Teams to ensure that the specific needs and priorities of our diverse communities are identified and included in the priorities for policing in local areas and across the Force. We also recognise that communities can help us to ensure that our policies and practices take account of the needs and experiences of different equality groups. In order to do this, effective consultation with diverse communities is essential and we will use a wide variety of consultative methods to actively engage with our diverse communities, working with them to improve the way in which we deliver our services.

Our Equality and Diversity Department works closely with our consultation unit to ensure that our consultation activities are inclusive of all our communities and to develop new ways of ensuring that all communities are able to get their views heard. We already have a number of established mechanisms in place through which we consult and engage with our communities. These include:

- **Surveys and questionnaires.** The Force conducts both formal mandated surveys, for example in relation to victim satisfaction, and local service reviews such as call back questionnaires. Regular electronic questionnaires are used to assess staff responses to specific issues.
- **Community Engagement:** Effective community engagement is central to the implementation of neighbourhood policing. Local neighbourhood teams work directly with local communities developing local networks and forums, ensuring that local concerns and issues determine local policing priorities.

- **Independent Advisory Groups:** The Constabulary has worked with IAG members to extend the IAG to encompass all 6 strands of diversity. There have been 2 meetings of the new Strategic IAG and it is developing in a positive way.
- **Police Liaison Meetings:** The Police Authority hosts regular open meetings across the Force area which provide local people with the opportunity to raise issues of concern about local policing.
- **Staff Associations:** The Joint Negotiating Committee (JNC) provides the formal negotiating structure for employee relations issues. Unions, the Police federation and Superintendents' Association are also actively engaged through attendance at strategic meetings and a range of informal and formal consultation processes.
- **Staff Support Groups:** Staff Support Groups include the Black Police Association, Christian Police Association, Force Disability Forum, Gay Police Association, Women in Policing Network. These groups provide welfare support and networking opportunities for staff. They are also actively engaged in supporting the force to develop its policies and practices to meet the needs of different staff groups.

We are constantly looking at how we can develop our consultation activities to ensure that they are fully reflective of all of our communities. Over the next two years we plan to develop this further and will be:

- Establishing and improving links with existing diverse community networks as part of our community engagement through Neighbourhood Policing
- Attending community events to obtain the views of those who do not always get their voices heard through traditional consultation methods. These will include Youth events, Pride events and Respect Festivals
- Establishing a new approach to consultation with young people

## **Consultation & Impact Assessment**

Consultation is an essential part of the impact assessment process. The Force has a number of consultation systems in place as well as a Strategic Independent Advisory

Group. Information gathered from our existing regular consultation processes can be used to inform the impact assessment process. If additional specific consultation is required policyholders and business change owners will undertake this themselves with the support of the Equality and Diversity, the Policy Unit and the Consultation Unit. These consultations will be reviewed as part of the monitoring process in order to ensure that those who are likely to be affected have been consulted.

## **SCREENING & IMPACT ASSESSMENT**

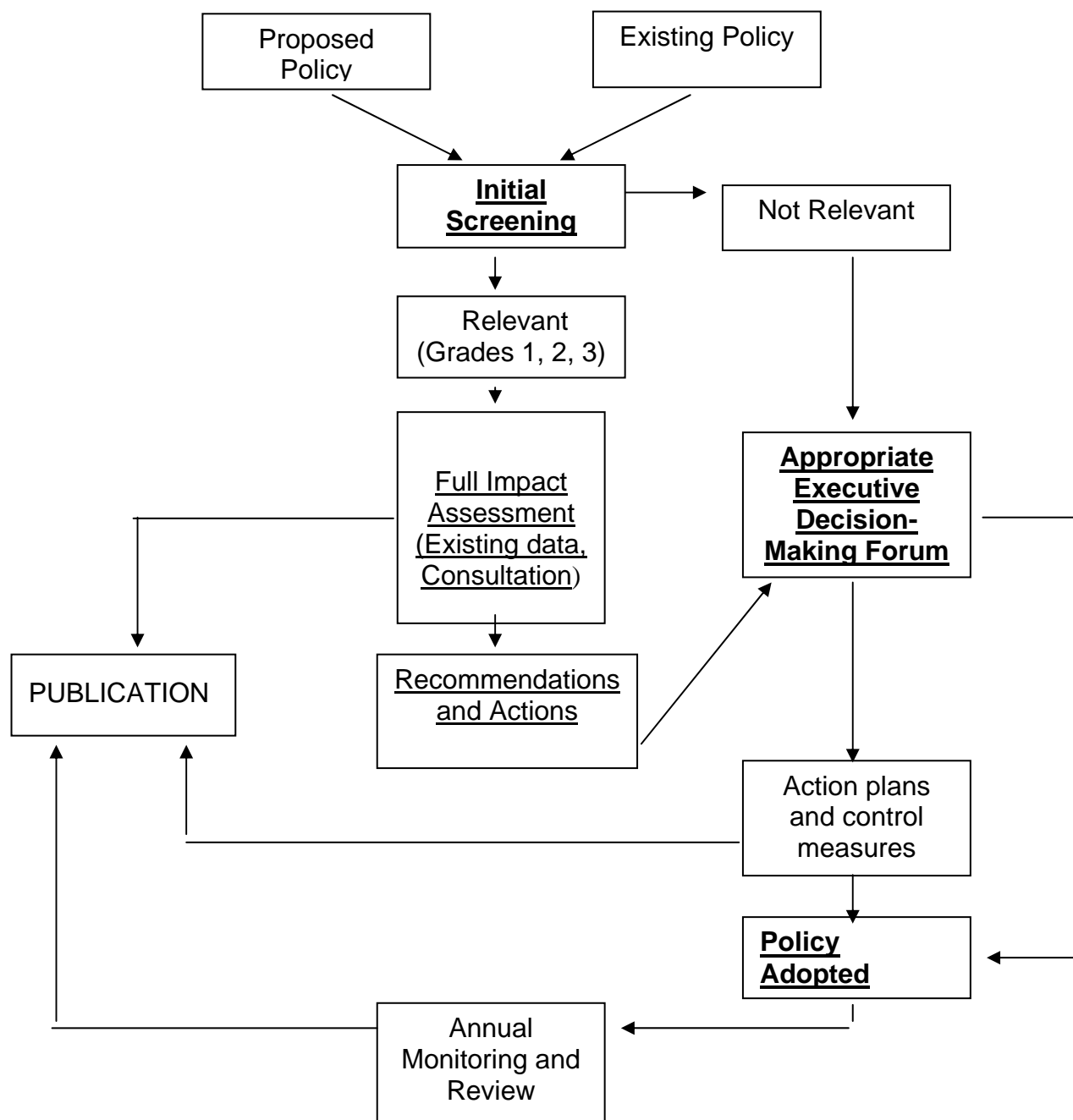
The purpose of the General Duty to promote gender equality is to require public authorities to adopt a proactive approach and to build equality into all decisions and activities. Impact assessment is a procedure through which this can be achieved. It provides a process through which an organisation can review its activities, decisions, and policies to ensure that particular groups are not disadvantaged and to identify where and how equality of opportunity can be improved and promoted. The requirement to impact assess extends to all of the decisions and activities of the organisation.

Devon and Cornwall Constabulary have made some progress in developing its understanding of, and capacity to undertake equality impact in response to the requirements of race equality legislation. The policy development process uses an initial screening audit for human rights, race and disability equality. A policy handbook has been produced to provide guidance to policy authors on the policy development process. An impact assessment template for race was used in the impact assessment training for policy officers across the Force, which took place in 2004. A number of race equality impact assessments have been completed and published. All policies assessed as relevant for race equality have been impact assessed and published on our website. Despite significant progress it is recognised that further work is needed to ensure the consistency and quality of equality impact assessment. A review of the process and the review calendar are currently underway.

The responsibility for policy development and review currently rests with individual departments. All Force policies and working practices undergo an initial screening by departmental policy officers to assess the potential implications for human rights, race and disability equality. This initial screening is a vital part of the policy development process. Audit forms are dip sampled to test how reliable our initial screening results are. Once completed, policies will be progressed as shown in the policy flow chart. All policies that have relevance for gender equality will undergo a full equality impact assessment. Priority will be given to those policies that are of high relevance, those of medium and low relevance will be fully impact assessed within realistic and agreed time scales. Departments are responsible for ensuring that equality impact assessments are undertaken in line with the agreed timescales.

Equality impact assessments will be carried out on all new and existing policies that have relevance to gender equality at least every three years. The Force Policy Unit will work with policy owners to update and agree a schedule for the completion of impact assessments.

## Policy Flow Chart



The Constabulary is currently working to extend the equality impact assessment process to the full range of decisions and activities undertaken by the organisation. Initial work has been done to build the equality impact assessment process into operational orders to ensure that equality issues are fully considered. Equality and diversity issues are standing agenda items on all departmental and BCU senior

management meetings. Further work is taking place to ensure that the implications for equality and diversity are fully considered within our decision-making processes.

Devon & Cornwall Constabulary is currently going through a process of major change. This is part of the development of our service to meet the needs of all our communities and to improve our ability to deal effectively with serious crime and national security. The Force recognises the potential and actual implications of these changes for men and women and for all vulnerable and 'hard to hear' communities. It is essential that during this period of change equality impact assessments form a key part of change processes.

## **ACCESS TO INFORMATION & SERVICES**

In support of our aim of '**providing services to meet the needs of our citizens**', the Constabulary is committed to making our services as accessible as possible to the communities we serve. We are continuing our efforts to increase the methods available by which people can contact us. This year we have provided an SMS text facility into our communications rooms which improves accessibility for minority groups and engagement with youth groups. We are also looking to increase our email service to provide another avenue for people to provide us with information or make non-urgent enquiries.

A new Constabulary website was launched in August 2009 that is fully accessible to all sectors of the community. The site offers an improved search mechanism, is better accessible to disabled people and provides printer friendly pages. You can also report a crime online and we plan to extend this further to later enable members of the public to track crimes and lost property online. In addition to the main Constabulary website we have a neighbourhood policing website specific to Devon, Cornwall and the Isles of Scilly, which displays information about how neighbourhood policing is conveyed in your area. Key features include:

## Version 2

- A post code search allowing you to view the information relevant to your own area
- Information on the structure of local policing and the nature of individual neighbourhoods
- Information on the individuals working within neighbourhood teams
- A list of current community priorities for each neighbourhood along with actions being taken to address them
- News articles and information on forthcoming public meetings, events and surgeries
- Contact details for the neighbourhood teams including an email mechanism so you can send messages to your respective team

We are continually thinking of new and innovative ways of improving how accessible we are to our customers and in 2008/2009 we moved 200 police officer back to front line duties to increase visibility and contact opportunities. Some initiatives that will be planned in more detail in the coming months include:

- Reviewing the opening hours of our front offices at police stations
- Increasing the use of our voicemail facility
- Gathering information from the commercial sector regarding how to improve the service people experience when they contact us.

We are committed to ensuring that the information and services that we provide are accessible to members of our diverse communities with community groups and our Independent advisory groups to ensure that this happens. Key priorities for the next two years include:

- Ensuring that information provided by the Constabulary is available in alternative formats

- Reviewing our interpretation and translation provision to ensure that it meets the needs of communities
- Developing relevant and appropriate information materials in different formats and languages in response to identified needs (e.g. PIP pack)
- Developing surgeries and drop-ins in community facilities in response to the needs of different communities
- Developing and implementing arrangements for third party and community hate crime reporting

## **EMPLOYMENT**

Our people are the most important asset we have, without them we cannot deliver the services that our communities need. The Constabulary has recognised that we can only achieve our vision of becoming a top performing Force if we value and empower our staff and this is a central theme of our new five year strategy.

The Constabulary is going through a period of rapid change and development. We are committed to increasing the visibility and productivity of our uniformed officers and staff and will ensure that sworn officers deployed to non-operational roles become the exception. In order to do this we will modernise our work force and deploy skilled police staff to undertake these roles wherever possible. We have returned 200 police officers into front-line roles.

As a Public Authority the Constabulary is subject to specific duties with regard to employment as part of its broader responsibilities under the equality duties. The purpose of these duties are to ensure that staff are treated fairly and that we do not discriminate in how we advertise our vacancies or the ways in which we recruit, develop, train, reward, promote and support our staff.

The Constabulary currently collects the full range of employment monitoring data required by the race and gender equality duties. We are examining mechanisms to monitor disability, faith and sexual orientation within the workforce and will be running

a census of staff in October 2009. Developing and implementing appropriate monitoring mechanisms is a key objective in this equality scheme. This currently monitors the following areas by ethnicity and gender:

- Number of staff in post
- Applicants for employment, training and promotion
- Number of staff who receive training
- Grievance (including Fairness at Work)
- Numbers of staff subject to the disciplinary process
- Number of staff who leave
- Performance Development Review
- Number of staff that receive special priority payments, competence related threshold payments or bonus payments.

We recognise the importance of regular analysis of employment monitoring data to enable us to identify and address any disproportionality. Employment monitoring data is included in our equality monitoring report and is regularly reviewed through our performance management process. The Constabulary publishes the employment data annually as required by the equality duties. The format for publication and the level of data provided is carefully considered in order to ensure that individuals cannot be identified. Publication takes account of our responsibilities under data protection, and freedom of information legislation.

The Constabulary is also committed to tackling gender inequalities in the work place and ensuring that the women and men that work for us are able to maximise their potential. Specific work has already been undertaken to address issues of gender inequality that have already been identified. These include measures to address occupational segregation and the under-representation of women in certain specialist roles through 'Open days' and road shows. Barriers in the working environment have been identified and addressed; for example ensuring that equipment and uniform is suitable and appropriate for women and men.

## **TRAINING**

The Equality and Diversity Training Unit has a representation of both Police Officers and Police Staff. The team is made up of 4.5 trainers and a Unit Manager.

Since 2006, a comprehensive equality and diversity theme has been successfully embedded into Initial Police Learning and Development programme for our new officers. PCSO and Police Staff induction training also contains elements of equality and diversity training. In 2008/2009 we reviewed the training programme. We have instigated an assessment programme that integrates the national occupational standard training package for managers (AA2) into the leadership programme and contextualises the training to meet the needs of our managers. The NOS AA1 is being assessed for all our staff as part of this programme and we have started with every sergeant in the organisation.

## **PROCUREMENT**

Procurement refers to the processes we use to source goods, facilities and services from other suppliers. We rely on other organisations to provide equipment and facilities that are necessary for the delivery of our services. We also work in partnership with other organisations to deliver particular aspects of our services. In view of the increased government focus on collaboration and shared services we will be seeking new ways of working with others to deliver our services more effectively and efficiently. We believe that it is essential that the individuals and organisations we work with understand our commitment to equality, are accountable to us, meet our obligations and duties under equality law and live up to our standards.

Our Procurement department are responsible for ensuring that our procurement and contracting processes comply with the General and Specific Duties. The Procurement department ensures that any company or organisation that tenders for the Force's

business must complete a company questionnaire which incorporates a section on equal opportunities. The questionnaire includes specific questions relating to the Race Relations Act 1976, the Race Relations (Amendment) Act 2000, the Sex Discrimination Act 1975, the Sexual Orientation and Religion Regulations 2003, the Equal Pay Act 1970 and the Disability Discrimination Act 1995 and 2005. The answers contained within the response to the questionnaire are used in the decision making process when awarding contracts. Those organisations that have been found to be non-compliant will not be considered.

Further work is needed to integrate equality impact assessment more fully into our procurement processes. This will involve undertaking an initial assessment to identify the relevance and potential impact on equality of the items or services that are being put out to tender. Work will then need to be undertaken to ensure that the tender specification adequately addresses the equality requirements identified through the assessment process. This work will be taken forward through the Equality Scheme Action Plan. Careful consideration will also need to be given to ensure that the development of shared service agreements take account of our responsibilities under the equality duties.

## **MONITORING & PERFORMANCE MANAGEMENT**

The implementation of the IES will be through the current internal performance management procedures. The action plan forms part of this IES and sets out the direction of actions over the next three years. It is based on the results of the internal gap analysis, findings from national research and issues identified from local information on differences in service delivery and employment. The action plan outlines the actions that will be taken to fulfil our equality objectives. The recommendations in the action plan have been placed on the Organisational Learning Database. This is a formal recording process that reviews progress and actions against the recommendations and provides a quarterly report through the strategic meeting structure.

As part of our move towards adopting the equality Standard for the Police Service the recommendations in the action plan will be incorporated into the business plans of individual departments and basic command units. The action plan details lines of accountability and clearly identifies the owner of the action and the delivery date expected. They are required to report on progress and comment on issues for review or development. Further work is required to mainstream performance management of the equality objectives and targets into the established performance management process.

Overall responsibility for the implementation of the IES and the fulfilment of the equality objectives sits with the Constabulary's Chief Officer Group. The Equality and Diversity Group will retain an overview of the scheme and action plan. Progress on the action plan will be reported to the Strategic IAG regularly and the IAG members will conduct an annual performance review as part of the action plan.

We are in the process of reviewing the range of performance data that is collated and published in order to extend publication to relevant service delivery data. The Constabulary is also reviewing the extent to which it promotes and publicises actions taken and progress made across the whole of the equalities agenda with a view to the production of an annual equalities progress report.

## **ASSESSMENT OF POLICIES AND FUNCTIONS FOR RELEVANCE UNDER THE RACE EQUALITY DUTY**

The ongoing review of our policies for relevance under the Race Relations Amendment Act is carried out by the policy owners as presented in the previous section describing our policy process. A full list of the current policies and the their assessment of relevance to the general duty is given on our force website and listed at APPENDIX E below. This auditing and assessment process is now in need of a review and the action plan reflects the need to review the policy process to ensure that that all the strands of diversity are included within the impact assessment.

## **PUBLICATION & REVIEW**

The Equality Scheme will initially be published in a text only version which will be available to be downloaded from our website and internally via the intranet. In line with our commitment to the Green Agenda, printed versions will only be available on request. The IES will be made available in different formats on request. In light of the potential changes to the IES which the Equality Bill may require when enacted we will not routinely produce Braille and signed versions of this IES until after the review of the impact of a new Equality Act in 2010.

Devon & Cornwall Constabulary will report on the progress of the scheme and the action plan annually. The annual progress review and updated action plan will be available on our website within 12 months of the date of publication of this version of the equality scheme. In addition the Constabulary produces a quarterly Equality Performance Monitoring Report which is available on request and can be downloaded from our web site. The Constabulary also produces an annual employment monitoring report which is available on request and can be downloaded from our website

## **COMMENT, FEEDBACK AND COMPLAINTS**

We welcome comment, feedback and complaints on this scheme, and on how we deal with the public, the provision of services and the conduct of our staff. This is a valuable way of gathering further information about our performance and what we can do to improve our services and to meet the needs of women and men. There are a variety of methods of providing us with this information.

You can write to the **Head of Equality & Diversity** at:

The Equality & Diversity Department

Police Headquarters

Middlemoor

Exeter

EX2 7HQ

## **Professional Standards Department**

Police Officers are subject to a statutory Code of Conduct which prohibits amongst other things any form of discriminatory behaviour. Complaints concerning the conduct of officers will be dealt with under Force Policy D21 (Public complaints against Police Officers, Police Staff and members of the Special Constabulary) ([Appendix C](#)).

Complaints concerning the policies or procedures as laid down by the Force (that is matters of direction and control) fall within Force Policy D245 (Complaints about Direction and Control) ([Appendix D](#)).

The procedure is publicised through leaflets and posters placed in public areas such as police stations, libraries and the Citizens Advice Bureaux. Complaints can be made either verbally or in writing to the Head of Professional Standards at the police headquarters address above.

## **THE EQUALITY & HUMAN RIGHTS COMMISSION (EHRC)**

The Equality and Human Rights Commission is a non-departmental public body established under the Equality Act 2006 – accountable for its public funds, but independent of government. The Commission champions equality and human rights for all, working to eliminate discrimination, reduce inequality, protect human rights and to build good relations, ensuring that everyone has a fair chance to participate in society. The new Commission brings together the work of the three previous equality commissions and also takes on responsibility for the other aspects of equality: age, sexual orientation and religion or belief, as well as human rights.

The EHRC can use its new enforcement powers where necessary to guarantee people's equality. It also has a mandate to promote understanding of the Human Rights Act. It has extensive legal powers and a dedicated directorate of expert lawyers who are specialists in equality law. This means that the Commission is well equipped to take legal action on behalf of individuals, especially where there are strategic opportunities to push the boundaries of the law. The Commission also has significant

Version 2

powers to enforce the equalities duties of organisations and authorities, including, ultimately, launching official inquiries and formal investigations.

The CEHR has promotional and enforcement powers and both apply to its work on the equality duties. If a public authority does not comply with its duties, its actions, or failure to act, can be subject to legal challenge. The CEHR has powers of enforcement over a public authority and can take action for non compliance. It has the power to audit and inspect where it believes non compliance has occurred.

**The EHRC can be contacted at:**

3 More London  
Riverside Tooley Street  
London, SE1 2RG

**Telephone:** 0203 1170235)

**Email:** [info@equalityhumanrights.com](mailto:info@equalityhumanrights.com)

The Equality and Human Rights Commission helpline provides information and guidance on discrimination and human rights issues. The helpline can be contacted by post at:

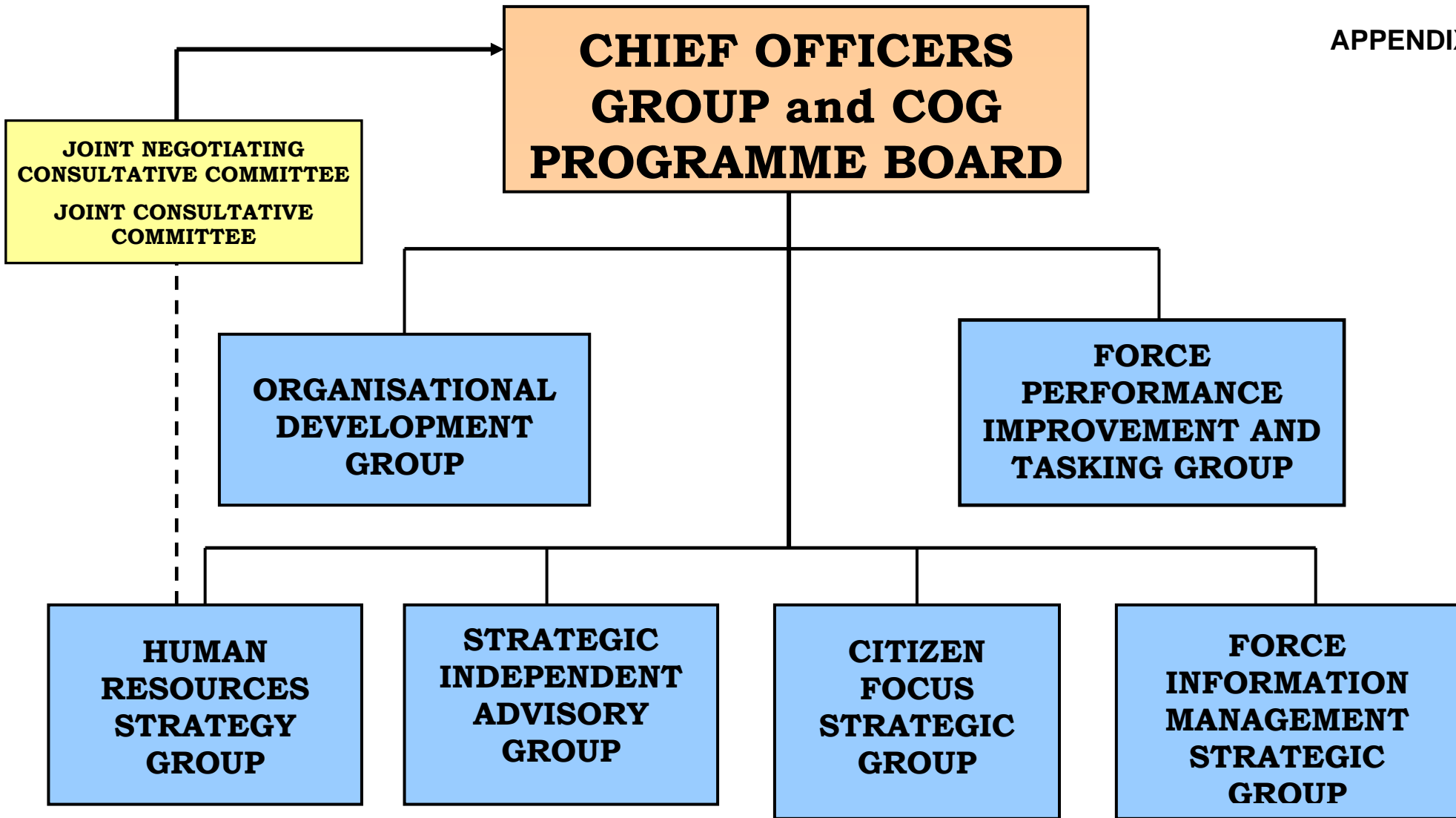
Equality and Human Rights Commission Helpline  
Freepost RRLG-GHUX-CTRX  
Arndale House  
Arndale Centre  
Manchester M4 3EQ

**Telephone:** Mon, Tue, Thu, Fri 9:00 am-5:00 pm; Wed 9:00 am-8:00 pm

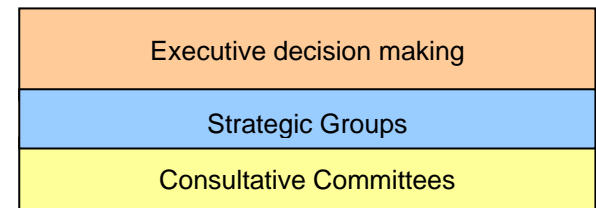
0845 604 6610 - England main number

0845 604 6620 - England textphone

0845 604 6630 - England fax



Force Strategic Meeting Structure



## **APPENDIX B**

### **Devon and Cornwall Constabulary**

#### **DIVERSITY STRATEGY**

##### **Introduction**

Devon & Cornwall Constabulary is committed to developing an anti-discriminatory, human rights led policing culture which recognises, respects and values diversity. Achieving this will require a process of organisational and cultural change which embeds diversity in all aspects of our policy and practice and enables us to meet the policing needs of all individuals and communities.

The purpose of the strategy is to provide a framework for a process of organisational and cultural change which will enable Devon & Cornwall Constabulary to effectively meet the needs of a diverse and changing society as a police service and as an employer. It identifies the key strategic objectives through which that change will be established.

##### **Strategic Aim**

To ensure that Devon & Cornwall Constabulary meets the needs of a diverse society and provides fair and appropriate treatment to all staff, service users and communities.

##### **Strategic Objectives**

The strategy addresses three priority areas:

- Prevention and investigation of crime
- Delivering services that meet the needs of all of our communities
- Embracing equality and diversity throughout the organisation .

Key objectives for each priority area are outlined below.

##### **Prevention and investigation of crime**

Investigate all incidents and crimes appropriately and with due regard to the specific needs of minority and other disadvantaged communities.

Ensure that all victims, families and witnesses are treated with respect and kept fully informed of the progress of their case in accordance with the victims code.

Ensure that appropriate and accessible support is available to meet the needs of vulnerable victims, families and witnesses.

Ensure that crime prevention strategies and initiatives fully address the needs and concerns of minority and disadvantaged communities.

### **Developing and improving relations with communities**

Ensure that the provision and delivery of services meets the needs of all communities .

Achieve and demonstrate fairness in the use of police powers.

Ensure that community engagement processes identify the issues and concerns of diverse communities as part of the PACT process.

Work in partnership to build strong and cohesive communities that value and celebrate diversity.

Promote good relations with all communities and build the trust and confidence of minority and excluded groups in the police.

Develop and support the lay involvement of minority and excluded groups.

### **Creating an organisational culture which recognises, respects and values diversity**

Ensure that the force complies fully with all existing and forthcoming legislative requirements in relation to diversity, equalities and human rights.

Promote good practice in diversity as public sector leaders and through partnerships.

Embed equality impact assessment into policy development, planning, service delivery, performance monitoring and business change processes.

Achieve a staffing profile that reflects the demography of the regional working age population.

Provide a working environment which respects and values diversity and within which staff are treated with dignity and respect.

Ensure that recruitment, advancement, specialisation, career development and welfare opportunities are relevant and accessible to all sections of a diverse community.

Ensure that learning and development equips staff to recognise and respond to the impact of diversity on all aspects of their role and work.

Ensure that all diversity learning and development meets agreed quality standards in relation to learning and development in diversity.

## **Strategic delivery & performance management**

Delivery of the diversity strategy is the responsibility of every part of the organisation. BCU and Department plans will outline and address areas for improvement and continuous development in support of the equality strategy.

The Deputy Chief Constable is accountable for the delivery of the equality and diversity strategy. The Director of Equality & Diversity is head of profession for the diversity function. The Corporate Equality & Diversity Department will provide specialist advice and guidance to BCUs and departments to support the delivery of the diversity strategy. Progress will be monitored and reviewed through the Strategic Equality & Diversity Group.

## APPENDIX C

### DEVON & CORNWALL CONSTABULARY POLICY & PROCEDURE – D21 PUBLIC COMPLAINTS AGAINST POLICE OFFICERS, POLICE STAFF AND MEMBERS OF THE SPECIAL CONSTABULARY

Version dated : 20/12/06

#### 1. Policy Statements/Intentions (Open)

##### The Scope of the Policy

1.1 The policy provides guidance on handling non-criminal complaints and allegations of criminal offences against persons serving with the police.

1.2 The Police Reform Act 2002 (the Act) established a new system for handling complaints against the police. Section 12 of this Act defines the matters that can be examined by the Independent Police Complaints Commission set up under section 9 of this Act and came into force on 1<sup>st</sup> April 2004.

1.3 Part 2 of the Police Reform Act 2002 provides the statutory framework for the handling of complaints against persons serving with the police made by a member of the public (as defined in section 12 (1)). The Act details procedures with reference to any complaint, whether in writing or otherwise, about the conduct of a person serving with the police. The act defines for the purposes of the handling of complaints, that a person is serving with the police if they are:

- \* a member of a police force;
- \* an employee of a police authority who is under the direction and control of a chief officer; or,
- \* a special constable

1.4 The Act does not apply to investigations instigated internally by the police or commenced as a result of a complaint by another person serving with the police. However, in cases involving criminal allegations the general principles on how the CPS handles such investigations will apply equally, including new charging scheme.

1.5 The Police (Conduct) Regulations 2004 are made under sections 50 & 51 of the Police Act 1996. Disciplinary offences are broad and may encompass breaches of the Code of Conduct (set out at Schedule 1 of the regulations) which also gives rise to criminal offences. Examples of such offences are:

- \* neglect of duty.
- \* dishonest or unfair behaviour
- \* incivility
- \* abuse of authority.
- \* racially discriminatory behaviour.

1.6 A complaint can be made against anyone who works for the police service, not just police officers and will include police staff, special constables, community support officers and some contracted escort and detention officers. These matters

must be formally recorded in accordance with the Police Reform Act and can only be concluded by:

- \* withdrawal of allegation
- \* local Resolution
- \* dispensation/discontinuance
- \* formal investigation

1.7 A complaint can be made by:

- \* Any member of the public who alleges that police misconduct was directed at them
- \* Any member of the public who alleges that they have been adversely affected by police misconduct, even if it was not directed at them.
- \* Any member of the public who claims that they witnessed misconduct by the police.
- \* A person acting on behalf of someone who falls within any of the three categories above, for example, a member of an organisation who has been given written permission.

1.8 Being 'adversely affected' is broadly interpreted in the legislation and includes distress, inconvenience, loss or damage, or being put in danger or at risk. This might apply, for example to other people present at the incident or to the parent of a child or young person or a friend of the person directly affected. It does not include someone distressed by watching the incident on television.

1.9 'Witness' has a narrow interpretation. A witness is defined in the Police Reform Act 2002 as someone who "acquired his knowledge of that conduct in a manner which would make him a competent witness capable of giving admissible evidence of that conduct in criminal proceedings". This includes for example someone in control of CCTV cameras in possession of material evidence.

1.10 A conviction for a criminal offence may give rise to proceedings against a person serving with the police for the disciplinary offence of criminal conduct.

1.11 Disciplinary offences must be proved on the balance of probabilities (Reg. 27).

## 2. POLICY AND AUDIT IDENTIFICATION (OPEN)

2.1 This policy has been drafted in accordance with the Principles of Human Rights legislation and Race Relations (Amendment) Act 2000. Under the Freedom of Information Act 2000, this document is classified as "OPEN" and therefore will be available for public disclosure.

2.2 Under the Race Relations (Amendment) Act we are obliged to monitor and publish, with reference to racial group but not by name, who has been the subject of disciplinary proceedings. Additionally, the Department monitors by reference to race, the number of complaints received and the number of complaints locally resolved.

## 3. Principles of Handling the Complaints (Open)

3.1 When dealing with allegations of criminal offences or misconduct against persons serving with the police there is a need to maintain:

- \* Transparency
- \* Consistency

3.2 Cases where persons serving with the police commit alleged criminal offences, should be reviewed in accordance with the Code for Crown Prosecutors in line with all other cases handled by the CPS. These cases have particular potential for attracting allegations of inconsistency, so it is important to maintain existing standards of decision making at all stages of the advice and prosecution process and to ensure that case decisions are consistent with existing procedures and previous decisions. The police while investigating those cases must adhere to exactly the same principles.

3.3 The CPS has agreed, with the Independent Police Complaints Commission, that decisions in all save the most serious and complex cases will be made within 28 days of receipt of the full file. Initial review of cases should take place within 48 hours of receipt of the file.

3.4 In cases considered clearly having insufficient evidence to support criminal proceedings written notification will be sent to the police and the complainant within five working days of receipt of the full file. Decisions in routine cases will normally be made within 10 working days of receipt of the full file.

#### 4. Introduction (Open)

4.1 The CPS Guidance and the Service Level Agreement (SLA) on the Handling of the Allegations of Criminal Offences Against Persons Serving with the Police has been recently updated to take account of a number legislative and regulatory changes, such as:

- \* The creation of Independent Police Complaints Commission (IPCC)
- \* The broadening of the definition of 'police complaint' so as to include police staff
- \* Changes in structure and casework location within the CPS whereby various categories of cases currently dealt with by Casework Directorate will be devolved to the CPS areas The CPS's central casework function will be re-configured to create three new discrete Divisions- Organised Crime, Counter-Terrorism and Special Crime Divisions.
- \* Amendments of the Code for Crown Prosecutors (the Code).
- \* New Manual of Guidance for Preparation, Processing and Submission of files
- \* The CPS Charging Standards agreed between ACPO and CPS, which are the only guidance on considering prosecution for the police decision-makers.
- \* The Director's Guidance on Charging. (Which is a part of the Pre-Charge Advice Force policy D162).

4.2 Under new arrangements set up by the SLA various categories of cases currently dealt with by the CPS Casework Directorate, will be devolved to the CPS Areas from 1<sup>st</sup> July 2005. Therefore, the Force will refer the case direct to the Unit Head of the Unit of the CPS Area designated to review and handle the case as per para. 22 of the SLA.

4.3 The SLA covers all allegations of criminal offences other than:

\* Allegations relating to the use of motor vehicles where it is not alleged that death has been caused (dealt with locally)

\* Allegations of criminal offences as set out in Annex A of the CPS Guidance, which are always dealt with by CPS Special Crime Division, not affected by the Agreement and remain unchanged.

4.4 The Independent Police Complaints Commission (IPCC) as an independent body set up of Part 2 of the Police Reform Act 2002, will itself investigate or manage the investigation of some complaints or supervise investigations. The IPCC will submit reports direct to the CPS in cases which they have investigated or managed.

4.5 The primary function of the IPCC is to ensure that it and the police put in place arrangements to address effectively and efficiently the handling of police complaints, the recording of conduct matters, and the investigation of both. In addition, the IPCC has an overarching guardianship role over the police complaints/misconduct system.

4.6 The CPS Guidance on the handling of allegations of criminal offences against persons serving with the police provides details of the forms of investigation by, and the criteria for mandatory and other referrals to, the IPCC (Annex B to the Guidance)

5. Policy and procedural links (Open)

5.1 D162 Pre-charge advice Policy

D221 Disclosure of unused material

D34 Domestic Disputes and Violence

D178 Business Interests

D85 Police Vehicles – care and maintenance

D245 Direction and Control (Organisational Complaints)

D315 Police Staff Discipline

D115 Special Constables

Disclosure Manual

Home Office Circular 08/2005

Home Office Circular 18/2006

6. PROCEDURES

Referrals of Complaints and Recordable Conduct Matters to the Independent Police Complaints Commission (IPCC) (OPEN)

Referrals to the IPCC

6.1 Increasing public confidence in the independence, accountability and integrity of the police complaints system will depend on the public seeing an effective response to the most serious incidents. The police must refer to the IPCC specific complaints or incidents that could damage public confidence in policing. Mandatory referrals, along with other cases that the police may decide to refer to the IPCC, help the police to demonstrate openness. These arrangements ensure that the IPCC can oversee these investigations with the appropriate level of external supervision.

Incidents of death or serious injury

6.2 There is a statutory duty to refer to the IPCC incidents where persons have died or been seriously injured following some form of direct or indirect contact with the police and there is reason to believe that the contact may have caused or contributed to the death or serious injury. They will be cases that do not involve a complaint or conduct matter when first identified or categorised.

#### Categories of mandatory referrals

6.3 The police must refer complaints and conduct matters that include the following allegations:

- \* Serious assault by a member of the police service
- \* Serious sexual assault by a member of the police service
- \* Serious corruption
- \* Criminal offence or behaviour aggravated by discriminatory behaviour
- \* Serious arrestable offences

Where there is doubt about whether a complaint or incident falls within the mandatory criteria, the IPCC encourages the force to refer. The police can seek IPCC advice about general policy on referrals but not in relation to a particular case. It must be referred for decision. The general test is whether the failure of the IPCC to intervene will undermine public confidence in the police.

#### Voluntary referrals to the IPCC

6.4 The IPCC encourages forces to refer complaints or incidents that do not come under the automatic referral categories but where there are serious concerns or exceptional circumstances that may have a significant impact on public confidence.

6.5 Where evidence comes to light that suggests there are types of complaint or incident that are causing particular public concern or are proving difficult for forces to investigate locally the IPCC will advise forces and encourage voluntary referral.

6.6 The IPCC encourages police authorities to refer a complaint or conduct matter if there are particular concerns about its seriousness or exceptional circumstances.

#### Call-in by the IPCC

6.7 The IPCC has the power to call in particular cases of concern or sensitivity which might not otherwise be referred to the IPCC.

#### Timescale for referral to the IPCC

6.8 Forces should refer complaints or incidents as soon as practicable and no later than the end of the working day following the day when it becomes clear to the force that it should be referred. The IPCC provides a 24-hour on-call facility to the police service. Referrals to the IPCC will not delay any initial action by the police in terms of incident scene management, or securing or preserving evidence.

6.9 Where it is thought that a complaint or recordable conduct matter falls within these referral parameters it should be forwarded without delay in the agreed format to the Professional Standards Department, Headquarters via message-switch or e-

mail ([professionalstandards@devoncornwall.pnn.police.uk](mailto:professionalstandards@devoncornwall.pnn.police.uk)). The initial file documentation should follow separately in the Force postal system.

7. Complaints made by Letter (Open)

7.1 Complaints received by BCUs or Departments should be immediately acknowledged.

7.2 The letter of complaint, a completed form 222a, and any other useful documents, should be placed in a Restricted Correspondence Folder, properly minuted and forwarded to the Professional Standards Department at the earliest opportunity. Officers completing form 222(a) should ensure they clearly identify themselves on the form.

8. Complaints made at a Police Station (Open)

8.1 Where a complaint is made in person at a police station, the complainant will be immediately referred to a supervisory officer, (in the case of police officers a supervisor not below the rank of substantive Sergeant). The supervisor will start and in many cases will be able to complete the complaint form 222a.

8.2 In the event of no supervisory person being available, the name and address and, where possible, the telephone number of the complainant will be recorded on an OIS Log. The complainant will be informed that arrangements will be made for a supervisory person to make contact within 24 hours.

8.3 The person taking the complaint should meet with the complainant in person at the earliest opportunity. Do not put practical obstacles in the way, for example by requiring a complainant to attend a police station. The police should be willing to go to the complainant or talk to them over the telephone. Time spent in discussion at the outset may lead to the resolution of the matter to the satisfaction of the complainant, without the need for a formal investigation.

8.4 At the time of meeting, the supervisory officer should hand to the complainant a copy of the leaflet issued by the Independent Police Complaints Commission entitled 'How to make a Complaint against the Police', in which the procedures are explained. The leaflet provides information to people whose first language is not English. Additionally, copies of the leaflets in different languages, in Braille, audio and large print are available by contacting the Professional Standards Department.

8.5 Where the complainant wishes to pursue the complaint, the supervisor will obtain full details of the complaint on a form 222a. An explanatory report and any other useful documentation, including custody record, charge sheet, copy prosecution file, etc., will be placed into a purple Restricted Correspondence Folder and forwarded to the Professional Standards Department as soon as possible. The ethnicity of the complainant must always be recorded.

8.6 The complainant is entitled to a copy of the complaint file with the exception of matters deemed necessary for the investigation of criminal offences or where disclosure must be restricted and it is not in the public interest. The whole of the

form 222a may ultimately be disclosable. Discretion should be exercised when filling out this form.

8.7 If the complainant is a juvenile or young person, then an appropriate adult should be present at all stages. The name and address of the appropriate adult should be recorded on the form 222a and any subsequent statements.

8.8 If the complainant is vulnerable, particularly those with learning disabilities or mental health problems, arrangements should be made to have an advocate or person they feel comfortable with present. The name and address of this person should be recorded on the form 222a and any subsequent statements.

8.9 Consideration for the use of interpreters should also be given to those for whom English is not their first language. This would include deaf people.

8.10 Where a group of people make similar complaints about the treatment they have received on a single occasion (for example, where a number of persons are arrested in a single operation and several of them subsequently complain separately that they were assaulted), each person's complaint should be recorded separately.

8.11 Where several complaints are made by different people about one incident (for example, in addition to the victim, witnesses may independently make complaints regarding an assault by a police officer) this should be recorded as one matter, since only one action is complained about.

## 9. Complaints made by Detained Persons (Open)

9.1 If a complaint is made by or on behalf of a detained person about his or her treatment since arrest or, it comes to the notice of any officer that a detained person may have been treated improperly, then this should be reported as soon as possible to an officer of the rank of inspector or above who is not connected with the investigation.

## 10. Complaints made against Off-duty Personnel (Open)

10.1 The police should ensure that complaints made about off-duty conduct are in the public interest and do not arise, for example, from a personal dispute.

10.2 There are restrictions on officers' private lives but this should be balanced against police officers' right to a private life. Off duty conduct must be judged against a high test of whether the conduct was likely or did bring the police service into disrepute. For example of a police officer has a dispute with a neighbour about parking or noise, it should not automatically trigger an investigation under off-duty conduct, simply because the neighbour knows the person is a police officer. It is a different issue if the officer decides to go 'on duty' in circumstances such as these by declaring authority by showing a warrant card.

10.3 The 'Police Code of Conduct' sets very high standards to follow at all times.

10.4 For police staff. A general standard of behaviour applies that they must not bring the force into disrepute by any of their actions.

11. COMPLAINTS INVOLVING INCIDENTS IN OTHER BCUS OR DEPARTMENTS (OPEN)

11.1 Complaints made against police employees serving in another BCU or Department, or in relation to incidents within another BCU or Department should be treated in the same manner as complaints made against police employees stationed in that BCU or Department.

12. COMPLAINTS AGAINST POLICE EMPLOYEES OF OTHER FORCES AND SECONDED POLICE EMPLOYEES (OPEN)

12.1 When a complaint is made against a police employee from another force, the complaint should be treated in the same manner as complaints made against police employees of this force.

12.2 When a complaint is made against any police employee seconded to the Central Service Units and NCIS, any less serious complaints should be dealt with locally. However, when a complaint is such that it should be referred for investigation, an investigating officer should be appointed, normally from the officer's parent force.

12.3 On conclusion of the investigation if it is decided that formal discipline should result, the officer should be returned to his or her force.

13. Administration (Open)

13.1 On initial receipt of a complaint file at PSD the complaint will be recorded and allocated a departmental reference.

13.2 Where the complaint requires mandatory referral or one of exceptional media or national interest, which the Deputy Chief Constable deems it prudent to refer, the complaint detail will be passed to the Independent Police Complaints Commission by e-mail from PSD Headquarters.

14. COMPLAINTS ALLEGING BREACH OF 'CODES OF PRACTICE FOR VICTIMS OF CRIME' (OPEN)

14.1 From April 2006 a specific complaint may be made where a victim feels the Devon & Cornwall Constabulary has not delivered its obligations under the 'Code of Practice for Victims of Crime'.

14.2 Each set of circumstances will need to be considered and a decision made whether the matter should be recorded as a complaint against police as defined by the Police Reform Act 2002 or alternatively a Direction and Control complaint against the organisation (D245 refers). Once designated the complaint will be dealt with accordingly.

14.3 It must be clearly marked on the form 222a or form 307 as appropriate that the complainant alleges a breach of the code.

14.4 The recipient MUST ensure that the victim receives a response within 10 working days.

14.5 The Professional Standards Department at Headquarters will be responsible for monitoring complaints received of breaches of the codes, the outcome of such complaints and action taken.

14.6 Victims have the right to refer their complaint to the parliamentary ombudsman via their MP if they feel the Devon & Cornwall Constabulary has failed to resolve the matter satisfactorily.

15. Indistinct or Imprecise Complaints (Open)

15.1 These generally occur when correspondence is received by the Force that may or may not involve a recordable complaint against police. If such correspondence is received forward it immediately in Restricted Correspondence folder to the Professional Standards Department at Force Headquarters.

16. Sub-judice Complaints (Open)

16.1 When a complaint is received and it is known that court proceedings are to be taken and the matter complained of is material to that court case the complaint will be considered to be sub-judice. The complainant should not be questioned unnecessarily. Enquiries made where a case is sub-judice can attract criticism because it may expose his or her defence to any court proceedings. A statement of complaint should not be taken.

16.2 Sub-judice may not apply to appeals e.g. if the appeal is against sentence but may apply where the appeal is against conviction.

16.3 Sub-judice rules do not apply to civil proceedings.

16.4 If the complaint is sub-judice, every step must be taken to secure supporting evidence and details of any potential witnesses.

17. Complaint Statement (Open)

17.1 As a general rule, no complaint statements will be taken at the time the initial complaint is made.

18. Preservation/seizure of Evidential Material (Open)

18.1 Evidence is anything that may assist in the investigation of a complaint to support or refute an allegation. Examples include (but are not restricted to):

- \* documentary evidence
- \* physical evidence
- \* other relevant evidence or items.

18.2 Documentary evidence includes (but is not restricted to):

- \* pocket note books

- \* custody records
- \* vehicle log books
- \* medical examination reports and forms
- \* statements
- \* premises searched reports
- \* copy warrants
- \* any relevant notes made by a witness.

18.3 Physical evidence includes (but is not restricted to):

- \* visible marks or injuries
- \* damage to property
- \* complainant's clothing
- \* clothing worn by the person complained against
- \* personal equipment of the person complained against eg baton, handcuffs, CS spray canister, torch, radio etc
- \* the alleged location eg cell, police vehicle etc (may need to be secured for further examination)
- \* video evidence eg custody office, helicopter camera footage, CCTV footage
- \* taped interviews.

18.4 Other evidence and items include (but are not restricted to):

- \* remarks or comments made by any person which may be relevant
- \* observations such as demeanour, behaviour, physical or psychological appearance
- \* details of witnesses and their relationship to the officer or complainant.

18.5 In every case where a complaint is made, immediate consideration should be given to the seizure of evidential material for use in the subsequent investigation. This responsibility rests with the officer receiving the initial complaint.

19. Local Resolution (Open)

19.1 Local Resolution is a system to encourage the speedy and satisfactory method of dealing with minor cases of complaint or misconduct. It is aimed at being conciliatory, rather than adversarial or legalistic. The system allows for explanations and in appropriate cases, apologies. It can be used to resolve conduct complaints against anyone who is serving with the police.

19.2 Matters Locally Resolved will still be recorded as complaints. Before a complainant can give consent to the Local Resolution of the complaint, they must have been informed of the right of appeal.

19.3 Such resolution may take place at the time, or within a short time of the complaint having been made. In such cases completion of appropriate sections of form 222a will suffice, to be forwarded to the Professional Standards Department at Headquarters.

19.4 A complaint may be Locally Resolved if the complainant consents and the alleged conduct, even if proved, would not justify a criminal or disciplinary charge in

the opinion of the officer taking the decision to Locally Resolve. This procedure, (otherwise than immediate resolution) is subject to the following conditions:

19.5 The person complained of must be informed of the allegation and of his or her rights to comment upon it if so desired (orally or in writing). Any statements made during the process will be inadmissible in any criminal, civil or disciplinary proceedings. However, it will not be rendered inadmissible if it consists of, or includes, an admission relating to additional matters.

19.6 The person resolving the complaint should not apologise on behalf of the person complained of unless he or she so agrees and he or she has admitted the conduct. An apology on behalf of the force can be given if it is felt appropriate.

19.7 A complainant has the right to appeal to the IPCC against the Local Resolution process within 28 days of the outcome. In considering whether the force handled it properly, the IPCC will look at:

- \* the type and level of information and explanation the police gave the complainant
- \* and in that light whether the complainant's consent was informed
- \* what other options were realistically available
- \* whether the process explained at the outset was in fact followed

19.8 Complaints of discriminatory behaviour meet the threshold for mandatory referral to the IPCC. However, it does not preclude the possibility of a Local Resolution being carried out, the views of the complainant have to be considered in these circumstances.

## 20. Meetings (Open)

20.1 Where it appears to the person resolving the complaint that it is likely to be assisted by a meeting between the complainant and the person complained of or between those persons together with any other person considered appropriate, arrangements for such a meeting may be made. The person complained of will not, however, be obliged to attend such a meeting.

20.2 Professional Standards staff have received training in Restorative Justice conferencing and can be used to facilitate this process.

## 21. Addition of more serious matters (Open)

21.1 If in the course of the Local Resolution procedure (whether by reason of a fresh allegation by the complainant, an admission by the officer concerned, or some other means) evidence comes to light of a more serious complaint which might require a formal investigation, the procedures should be terminated. The complainant should be advised accordingly.

## 22. FINALISATION OF LOCALLY RESOLVED COMPLAINTS

22.1 Locally Resolved complaints will be received within the Professional Standards Department. The PSD Investigating Officers may consider that the matters dealt with warrant a fuller investigation. This will be formally undertaken by the Professional Standards Department.

22.2 At the conclusion of the Local Resolution process a letter should be sent to complainants informing them of the outcome. Complainants should be told of their right to appeal to the Independent Police Complaints Commission against the process undertaken within 28 days. The IPCC leaflet 'Appealing against the Local Resolution Process' should accompany the letter to the complainants.

### 23. Conduct of Investigation (Open)

23.1 The purpose of an investigation into a complaint is to establish the facts and to make an objective assessment on the evidence obtained.

23.2 It is important that the investigation is impartial, thorough and that the complainant and person complained of are updated regularly as to the progress made.

23.3 The Professional Standards Department will investigate all complaints against Police Staff that are of a protracted or serious nature. In such cases consultation with the relevant Personnel Manager will take place, but primacy will remain within the Department.

### 24. Types of Investigation (Open)

24.1 The IPCC acknowledges four types of complaint/misconduct investigation

(i) Local Investigation – may be carried out by the "home" force or by another force without overseeing by the IPCC.

(ii) Supervised Investigation – a police investigation overseen by the IPCC, but under the direction and control of the police. The police also provide the Investigating Officer, investigating team and resources.

(iii) Managed Investigation – a police investigation where the police provide the Investigating Officer, investigating team and resources, but which is under the direction and control of the IPCC.

(iv) An Independent Investigation – under the direction and control of the IPCC and carried out by its own investigators.

### 25. Appointment of Investigating Officer (Open)

25.1 The head of the Professional Standards Department on behalf of the Deputy Chief Constable appoints investigating officers.

### 26. NOTIFICATION OF INVESTIGATION (OPEN)

26.1 The notification of the investigation to the employee concerned is the responsibility of the investigating officer. Unless there are good reasons for not doing

so, the person should be notified in writing of the investigation as soon as reasonably practicable and should be informed of his or her rights. The wording of the Regulation 9 to a Police Officer or Special Constable or a Notice of Investigation upon a police staff member should be specific and clearly refer to which principles of the Code of Conduct may have been breached.

26.2 The presumption is that, regardless of whether the matter concerns a report, allegation or complaint, the person concerned should be notified of the investigation at the outset unless it would be prejudicial to the investigation to do so.

## 27. SERVICE OF REGULATION 9 NOTICE AND NOTICE OF INVESTIGATION (OPEN)

27.1 The Regulation 9 Notice and Notice of Investigation will inform the person subject of complaint:

- i) details of the report allegation or complaint made
- ii) guidance to the person under investigation
- iii) that the Notice does not necessarily imply that disciplinary proceedings will be taken but is served to safeguard interests

27.2 If additional information comes to light that further complaints exist further Regulation 9 Notices of Notices of Investigation will be prepared and served on the person subject of investigation as soon as practicable.

27.3 Where a person under investigation is on long term sick leave a Notice may be served in consultation with the Police Federation or trade union representative, if it is believed it would not harm the recovery of the person by doing so.

## 28. Suspension of Police Officers (Open)

28.1 When a report, allegation or complaint is received from which it appears a police officer may have committed a misconduct or criminal offence of sufficient seriousness, the Deputy Chief Constable may suspend that officer from duties as a constable.

28.2 At the time of suspension from duty, a Notice (Form 222k) will be served, containing comprehensive notes for the guidance of the officer stating how he or she should conduct themselves during the period of suspension. Contact by a nominated liaison officer will be maintained with a suspended officer on a regular basis.

28.3 The nominated liaison officer will normally be from the officer's BCU/Department. The Professional Standards department will provide a guide for nominated liaison officers.

28.4 Prior to suspension, the investigating officer should contact the Joint Branch Board at Pynes Hill, Exeter with a view to obtaining the assistance of a Federation officer to undertake a welfare role on behalf of the suspended officer.

28.5 An officer's suspension will be reviewed on a monthly basis and the outcome will be notified to him or her via the Head of the Professional Standards Department.

28.6 The suspended officer will be informed of the availability of the assistance of Validium Employee Assistance Programme and the Force Chaplaincy service.

28.7 When the Deputy Chief Constable has considered the case he or she will decide if and when the suspension will be lifted.

28.8 A suspended officer may not resign without the approval of the Chief Constable where it is necessary for the maintenance of public confidence. The public interest may require that an officer should be required to face misconduct proceedings notwithstanding that the officer may wish to retire.

29. Suspension of Police Staff (Open)

29.1 Please see Policy and Procedure Document D315.

30. Suspension of Special Constables (Open)

30.1 Please see Policy and Procedure Document D115.

31. INVESTIGATION (CRIME) (OPEN)

31.1 In practice officers from the Professional Standards Department will investigate most complaints against police involving allegations of criminal offences. Allegations of crime that do not involve a public complaint will generally be dealt with by the relevant BCU. Exceptionally the Chief Constable may ask another force to investigate. In cases referred to the CPS the police will provide written details with the case papers of the name of the officers responsible for the case.

31.2 Where a person serving with the police is alleged to have committed a criminal offence a normal criminal investigation will take place, in accordance with the PACE Code of Practice for the Detention, Treatment and Questioning of Persons by Police Officers (Code C).

31.3 Any verbal or written statement made by a police employee in the course of an investigation into any alleged criminal conduct by the employee may be admissible in any subsequent misconduct proceedings brought against that employee providing the employee agrees.

31.4 Early involvement of the CPS in serious cases should be automatic through a case conference involving other agencies as appropriate. This can help clarify avenues of investigation where a criminal offence may be involved; identify the kind of evidence to be obtained; minimise the risk of evidence being ruled inadmissible by not being obtained correctly; identify human rights issues and advise on the nature of the charge.

31.5 The case papers will be submitted to the nominated CPS office. The format will be in accordance with the Service Level Agreement with the CPS (Appendix A). This submission is made to protect the credibility of the complaints investigation procedure and to distance the police from the decision making process.

31.6 In supervised investigations, the responsibility for direction and control of the investigation will remain with the police. At the conclusion of the investigation, if it is

determined that an offence may have been committed, it will be for the police to submit the investigator's report to the CPS. Thereafter, it will be for the CPS lawyer to conduct a case review in accordance with the Code for Crown Prosecutors.

31.7 In an independent or managed investigation, the IPCC Commissioner will decide, having considered all the available evidence and having taken advice from an IPCC lawyer, whether there is evidence that a criminal offence may have been committed. If the Commissioner concludes that there is such evidence, the case will be formally sent to the CPS. Thereafter, it will be for the Crown Prosecutor to conduct a case review in accordance with the Code for Crown Prosecutors.

31.8 In the event that the CPS concludes that there is insufficient evidence to prosecute, or, that it is not in the public interest to do so, the CPS will be responsible for informing the complainant of their decision. The police will decide what, if any, subsequent action to bring and will inform the complainant accordingly. If the complainant in such circumstances is dissatisfied with the police decision in the case, an appeal will lie to the IPCC.

31.9 When taking the charging decision in relation to allegations of criminal offences against persons serving with the police the tests in the Code for Crown Prosecutors will be applied. It is important for the maintenance of public and police confidence in the arrangements for investigation and prosecution that a different standard is not allowed to develop.

31.10 Generally an investigation report will not be disclosed to the complainant or person complained of in advance of a decision to prosecute. Such disclosure may prejudice any trial.

## 32. Investigation (Misconduct) (Open)

32.1 In practice officers from the Professional Standards Department will investigate most allegations of misconduct against persons serving with the police. Exceptionally, the Chief Constable may ask another force to investigate.

32.2 The complainant should be told how long the investigation is likely to take. The current national standard for the submission of files is 120 days.

32.3 At the end of the investigation, the complainant and the person complained of will normally be given a copy of the investigating officer's report.

32.4 Where it has been decided that misconduct charges will not be made against a Police Employee, against whom a complaint has been made, that person can request details of the complaint. The request should be made through the BCU or Departmental Commander to the Deputy Chief Constable.

32.5 The request will be granted unless the Deputy Chief Constable:

- i) considers that to supply details might prejudice any pending criminal investigations or proceedings.
- ii) is of the opinion that it would in some other way be contrary to the public interest to supply the details and the Secretary of State agrees.

32.6 If details are provided it will only contain information that relates to the applicant.

32.7 Investigating officers should carry out risk assessments as they are compiling evidence as to whether information should go in the main body of the report, which will be disclosed or in an annex of material that may not be disclosed because of the risk of harm.

33. Civil Proceedings (Open)

33.1 Any application for the disclosure of information obtained during the course of a misconduct investigation should be acknowledged and then referred to the Director of Legal Services for advice.

34. Interviews (Open)

34.1 Police employees may not be compelled to answer any question put to him or her during the course of an interview.

34.2 Any investigation into an allegation of crime that involves a police employee will be conducted taking into account the provisions of the Police and Criminal Evidence Act and the Codes of Practice. At the time of the interview the police employee will be entitled to have a solicitor, Federation Representative or Union Representative present.

34.3 Police employees interviewed in respect of misconduct matters are not entitled to legal representation during the course of the interview. Police officers have the right to be accompanied in interview by a serving member of the police (Regulation 9 Police Conduct Regulations (2004)).

34.4 Under normal circumstances an officer subject of a criminal investigation will be invited to attend a police station as a voluntary attender. Prior to interview he or she will be informed that they are not under arrest.

34.5 All interviews will be tape-recorded unless the person refuses; in which case PACE requirements will apply.

35. Duty Reports (Open)

35.1 In the course of enquiries the investigating officer can, if necessary, call for a duty report from any person who is believed to have information that may assist in those enquiries.

35.2 Any person who is not subject to a Regulation 9 or Notice of Investigation should be reassured that any submitted duty report cannot be used against them in any subsequent disciplinary or misconduct proceedings. However, the report can form part of the complaint or misconduct investigation file.

36. Written Response (Open)

36.1 Where a police employee elects to make a written response to a complaint made against him/her the investigating officer should consider the content of that response. Where it is apparent that the maker has avoided an issue or issues have not been properly addressed, the investigating officer will ask for those issues to be clarified, or consider a taped interview.

### 37. COMPLAINT OUTCOMES (OPEN)

37.1 The findings include: -

- \* complaint proven – misconduct hearing
- \* complaint proven - written warning
- \* complaint proven - verbal advice
- \* complaint not proven – no further action
- \* a review may be requested and changes made to force policy, to address matters of direction and control (organisational issues).

37.2 All complaint records will be reviewed in order to identify any lessons to be learned. They will also be used to monitor patterns in the types of conduct complaints received by the Force, in order to address the underlying causes (where appropriate).

### 38. PROCEDURES FOLLOWING SUBMISSION OF INVESTIGATING OFFICER'S REPORT (PUBLIC COMPLAINT) (OPEN)

38.1 In public complaint cases, it is a requirement that the complainant is notified usually by way of letter as to the investigation findings. They are informed whether the complaint is proven or not and of any misconduct proceedings that are proposed. The complainant has a right of appeal to the IPCC if they are dissatisfied with the outcome or proposed disciplinary recommendations. The IPCC will correspond directly with the complainant. The appeal must be lodged within 28 days of receipt of the notification letter.

38.2 If the complainant appeals, the IPCC may:

- i) agree with the investigation findings
- ii) require more information from the Force in order to make a judgement
- iii) disagree with the recommendations, and in exceptional circumstances to insist upon a different resolution, for example to pursue misconduct proceedings, which the Force may deem to be inappropriate.

### 39. INTERNAL MISCONDUCT (OPEN)

39.1 The Deputy Chief Constable has an overall responsibility for all matters relating to internal misconduct within the Force. This applies to all police employees.

39.2 Within the BCU's and Departments the initial responsibility for disciplinary matters rests with the Commanders.

39.3 All Commanders have authority to deal with minor breaches that they consider do not warrant formal misconduct proceedings. In more serious cases the Commander may seek advice from the Professional Standards Department. All serious allegations of misconduct against police employees must be brought to the attention of the Professional Standards Department.

39.4 Where the alleged breach is of a more serious nature the Deputy Chief Constable, in liaison with the Commander of PSD who will appoint an investigating officer. If the matter is urgent, and out of office hours, the 'duty officer' from the Professional Standards Department may be contacted via the Force Control Inspector in the first instance.

39.5 If anyone believes that misconduct involving a police employee is occurring, this should be brought to the attention of his or her supervisor. Reference can also be made to the Special Cases Unit.

39.6 If a subsequent investigation provides no evidence of misconduct, no action will be taken to the detriment of the reporter unless it was a malicious report.

#### 40. Formal Disciplinary Findings (Open)

40.1 Formal disciplinary findings will become expunged after the following periods of time:

A reprimand or fine – 3 years

Reduction in rank – 5 years

Superintendents written warning – 1 year

40.2 A caution does not attract an expungement date and is therefore not future citeable.

#### 41. Police Staff Discipline (Open)

41.1 Please see Policy and Procedure Document D315.

41.2 Special Constable Discipline (Open)

Please see Policy and Procedure Document D115.

#### 43. POLICE EMPLOYEES WHO COMMIT DOMESTIC VIOLENCE RELATED OFFENCES (OPEN)

43.1 Please see Policy and Procedure Document D34

#### 44. MEMBERSHIP OF UNACCEPTABLE ORGANISATIONS

44.1 Police Officers, Police Staff and Special Constables have a general duty to promote race equality and it is unacceptable to the Force for any member to be an active member of any organisation that encourages discrimination against any person by virtue of their race, creed, colour or religion.

44.2 For the purposes of this policy, unacceptable organisations include; The British National Party, Combat 18 and the National Front.

44.3 Active membership could involve such activities as: the participation in leaflet drops, meetings, fund raising and speaking on behalf of or writing articles for the said organisations. These activities are not exhaustive.

44.4 These activities remain unacceptable, regardless of whether or not an individual is a formal member of the stated organisations and such activities will lead to an investigation as to whether any discipline offence has been committed.

45. Professional Standards Department Resources (Open)

45.1 A dedicated Professional Standards Department establishment will be maintained at Police Headquarters with satellite branches at Plymouth and Falmouth. However, Chief Superintendents, Superintendents, Chief Inspectors, and Inspectors may be required to investigate complaints against police.

46. Monitoring (Open)

46.1 A record of all complaints made against police will be maintained at Force headquarters.

46.2 All recorded complaints are accessible and open to review by members of the Police Authority whose Complaint and Discipline Monitoring Group make regular inspections.

47. Review  
(Open)

47.1 The annual review of this guideline is the responsibility of the Head of the Professional Standards Department.

## APPENDIX D

### DEVON AND CORNWALL CONSTABULARY POLICY AND PROCEDURES D245 COMPLAINTS ABOUT DIRECTION AND CONTROL

Version dated: 14/10/05

#### 1. POLICY STATEMENT (OPEN)

1.1 Anyone who wishes to complain to the Devon and Cornwall Constabulary about the general level of service are encouraged to do so as set out in the Force Charter. This can provide valuable information about perceptions by members of the public in relation to our performance, particularly with regard to Force policy and procedures. It can provide the spur for improvements in service delivery.

1.2 The Direction and Control Complaints procedure is not to be confused with the Complaints against Police procedure, which applies when a member of the public wants to complain about the conduct of a police officer, police staff member or special constable. This procedure is covered separately in Policy and Procedure Guideline D21.

1.3 Direction and Control Complaints procedure is publicised through leaflets and posters placed in public area (e.g. police stations, libraries, Citizen Advice Bureau).

1.4 Training will be given to Police Employees who deal with direction and control complaints as part of the input they receive from Professional Standards on promotion. Further advice can be sought from the Professional Standards Legal Assistant.

1.5 Complaints will be recorded on a 'Direction and Control Complaints' form 307 and attempts should be made to resolve the grievance at the lowest possible level by way of an explanation or an apology, if appropriate. In some cases it will be necessary to route the complaint to another department or BCU.

1.6 In either case the form 307 should be completed and routed to the Professional Standards Department, Headquarters who centrally record and monitor organisational complaints. The Professional Standards Department will not normally 'investigate' organisational complaints but will provide appropriate management information in order that the Force can assess and improve the overall service. They will generate the appropriate management information.

**1.7 IT IS IMPORTANT TO NOTE A REVISED FORM 307 WHICH INCLUDES THE 16+1 ETHNICITY CODES, SHOULD BE USED IN ALL CASES. ACCURATE RECORDING OF SUCH INFORMATION IS VITAL TO PROVIDE DATA IN SERVICE DELIVERY TO THE DIVERSE COMMUNITIES IN THE AREA WE SERVE.**

#### 2. Policy and Audit Identification (Open)

**2.1 THIS POLICY HAS BEEN DRAFTED AND AUDITED IN ACCORDANCE WITH THE PRINCIPLES OF HUMAN RIGHTS LEGISLATION AND RACE RELATIONS (AMENDMENT) ACT 2000. UNDER THE FREEDOM OF INFORMATION ACT 2000, THIS DOCUMENT IS CLASSIFIED AS 'OPEN' AND THEREFORE WILL BE AVAILABLE FOR PUBLIC DISCLOSURE.**

### **3. Definition of Terms (Open)**

What constitutes a Direction and Control Complaint?

3.1 Communications, either written or verbal, where a member of the public expresses dissatisfaction with the service they have personally received, other than circumstances which indicate a complaint about the conduct of an individual.

3.2 The meaning of the expression 'direction and control' may be subject to interpretation by the courts and/or rulings on appeal by the IPCC. The advice in this guidance should not therefore be regarded as a definitive interpretation. 'Direction and Control' includes matters of strategy, policy, structure, organisation and central force command concerning general policing, resources and budgetary issues.

3.3 This is to be contrasted with matters of day-to-day tactics, control, organisation, administration and service delivery, which might include management or operational aspects of the Force or of Force detachments, which would not be matters of direction and control.

The following are examples of areas relating to direction and control:

\* The formulation of guidelines and the making of general decisions on the deployment and posting of officers or groups of officers.

\* The allocation of personnel, financial and material resources in certain sectors or geographical areas.

\* A policy decision on how – generally – to perform certain functions – for example licensing, use of firearms and stop and search.

\* The formulation of principles and protocols governing the appointment, recruitment, promotion, discipline and dismissal etc. of subordinate officers and police staff.

3.5 Conversely the following would not normally be considered to involve direction and control:

\* The making of a specific decision on the deployment of officers for a particular investigation or operation – for example, a decision to take a very large number of officers to search a small house despite no expectation of violent resistance.

\* The decision to (or not to) arrest and prosecute a particular suspect for a certain crime.

\* The application of policies on certain functions (for example licensing, use of firearms and stop and search) in particular cases; and

\* The appointment, recruitment, promotion, discipline and dismissal etc. of particular subordinate officers and police staff.

3.6 Complaints or allegations that relate, or may relate, to the conduct of a police officer, police employee or special constable will continue to be dealt with through the normal complaints processes, as set out in Part 2 of the Police Reform Act 2002. Where there is doubt about whether a complaint relates to the conduct of a police officer, police staff member or special constable the presumption should be to proceed with the matter as if the complaint does relate to conduct, until such time as any preliminary inquiries or investigations demonstrate this not to be the case. This is to avoid prejudice to the application of the conduct procedures, should they be later shown to be appropriate.

3.7 The responsibility for deciding whether or not to treat a complaint or part of a complaint as relating to direction and control lies with the Chief Officer, except where the complaint is about the actions of a Senior (ACPO Rank) Officer, when responsibility lies with the Police Authority.

3.8 Complainants have the right of appeal to the Independent Police Complaints Commission on the ground that they believe the complaint should have been treated as one of conduct rather than one of direction and control.

#### 4. PROCEDURE (OPEN)

It is the responsibility of each BCU or Department to accept organisational complaints, investigate the circumstances, reply to the complaints and use the information gained to improve the quality of service for the future. All information should be recorded on the form provided and sent to the Professional Standards Department, Headquarters for centralised recording. The Professional Standards Department will not carry out an investigation but the centralised recording and monitoring system will help to provide management information with a view to improving the service we provide.

#### 5. WRITTEN COMPLAINTS (OPEN)

5.1 All written complaints must receive a response and be recorded on the Direction and Control Complaints form 307.

5.2 When correspondence is received an acknowledgement letter will be sent to the complainant stating who is dealing with the matter.

5.3 The complaint will then be investigated thoroughly; a reply sent and the Direction and Control Complaints form 307 completed and returned to the Professional Standards Department, Headquarters. It is important that the complainant is kept updated as to the progress of their complaint. At a minimum contact by letter, telephone call or e-mail should be made once a month.

5.4 Any Organisational Complaint which arrives addressed directly to the Chief Constable will be forwarded to the Professional Standards Department who will acknowledge the letter and forward to the relevant department or BCU as a 'Miscellaneous' file which will include a blank form 307. The responsible department or BCU will deal with the complaint and send the finalised form 307 back to the Professional Standards Department.

Verbal complaints (telephone/personal callers)

5.5 All verbal complaints must be recorded on the 'Direction and Control Complaints' form 307. Discretion is required to distinguish between an actual complaint and a passing comment.

5.6 Listen, take ownership, reassure and advise the caller as necessary – do not make excuses. Find out enough to fill in the 'Direction and Control Complaints' form 307. Offer an apology if necessary; tell the person their complaint has been lodged. If the caller is satisfied thank them for calling and send the form to the Professional Standards Department, Headquarters.

5.7 If the caller is not satisfied, find out why and, if necessary, refer them to a supervisory officer who will listen to the problem, arrange necessary action and give an explanation. Once finalised the 'Directions and Control Complaints' form 307 should be completed and returned as outlined above

## 6. CONTINUOUS IMPROVEMENT (OPEN)

6.1 The Force is committed to continuously improving service delivery to the community it serves. The 'Directions and Control Complaints' procedure is an important means of listening to the public and feeding improvements back into policy, procedure and working practices.

6.2 In order to maximise learning, copies of all Direction and Control complaints will be sent to the Strategic Development Department Inspections Unit on completion. This will enable more effective inspections and Best Value Reviews.

6.3 Where potential major improvements in service have been identified then the relevant BCU or Department will include that issue as part of its continuous improvement plan.

6.4 The implementation of the relevant improvement will be the responsibility of the relevant BCU Commander or Department Head and will be monitored through the Force Performance Monitoring Group.

6.5 Each BCU and Departmental Commander will 'Champion' issues in relation to Direction and Control complaints and will monitor compliance with this policy.

## REVIEW (OPEN)

7.1 The annual review of this guideline is the responsibility of the Head of the Professional Standards Department.

## APPENDIX E

### FORCE POLICIES – STATUS ON HUMAN RIGHTS, RACE RELATIONS AND FREEDOM OF INFORMATION AUDIT as at 11<sup>th</sup> September 2009

All new policies are audited for ECHR, Race Relations (Amendment) Act, Disability Discrimination Act, Policing Bureaucracy and Freedom of Information Act. In addition, annual reviews are conducted and specific implications in relation to the Disability Discrimination Act are reviewed and highlighted together with any implications in respect of Airwave.

- \* Those policies marked thus are policies that have been audited for RR(A)A but whose annual reviews are outstanding for a number of years. These outstanding policies have been raised on an annual basis with the relevant departmental commanders/heads.

There are 274 current policies - should any PPS guideline number be omitted this is due to the policy being removed from the system as it is no longer applicable (there are currently 87 unallocated policy numbers).

Of the 274 current policies:

- 4 are suspended pending fundamental organisational reviews
- Of the remaining 270 all have been ECHR audited and are ECHR compliant, whilst 5 are outstanding for FOIA as well as overdue for the three year cycle of initial screening audits
- 19 policies have Full Race Impact Assessments (with two of the 20 also Human Rights Impact Assessed)
- 1 has an Equality Impact Assessment (plus 3 on Race General Duty)

Relevant to General Duty (Initial Screening Audits)

231	=	None
24	=	3
8	=	2
7	=	1
4		suspended
0		awaiting audit

274 total

- Those policies marked thus are policies that have been audited for RR(A)A but whose annual reviews are outstanding for a number of years. These outstanding policies have been raised on an annual basis with the relevant departmental commanders/heads.

**FORCE POLICIES – STATUS ON HUMAN RIGHTS, RACE RELATIONS AND  
FREEDOM OF INFORMATION AUDIT**

<b>Policy</b>	<b>Title</b>	<b>Policy Owner</b>	<b>Dates of ECHR Audit FOIA Audit</b>	<b>Relevant to General Duty 3 = Little 2 = Some 1 = A lot</b>	<b>Last annual review or update</b>	<b>RR(A)A Audit carried out</b>
<b>D1</b>	Abduction of Children and Young Persons - Wards of Court	Crime	03/10/08- ECHR 03/10/08-FOIA	None	02/10/08	03/10/08
<b>D2</b>	Collision Recording and Reporting	Criminal Justice	12/06/09- ECHR 12/06/09-FOIA	None	20/05/09	12/06/09
<b>D3</b>	Vision Testing and Spectacle Provision	Finance	23/07/08- ECHR 23/07/08- FOIA	None	09/06/08	23/07/08
<b>D4</b>	Allowances: Housing and Transitional Rent Allowances	Finance	19/06/07- ECHR 19/06/07-FOIA	None	25/06/07	19/06/07
<b>D5</b>	Food & Accommodation Claimable Expenses	Finance	12/03/07- ECHR 12/03/07-FOIA	None	24/12/08	12/03/07
<b>D7</b>	Travel Expenses	Finance	12/03/07- ECHR 12/03/07-FOIA	None	07/08/09	12/03/07
<b>D8</b>	Bail (including Street Bail)	Criminal Justice	22/08/08- ECHR 22/08/08-FOIA	None	06/08/09	22/08/08
<b>D9</b>	Bomb Threats, suspect packages and scene mgt	Operations - Contingency Planning	22/04/09 - ECHR 22/04/09 - FOIA	None	01/02/09	22/04/09
<b>D10</b>	Performance & Development Review Policy – Police Officer and Police Staff	HR	23/04/08 - ECHR 23/04/08 - FOIA	None	25/07/08	23/04/08
<b>D11</b>	Installation and Monitoring of Force Closed Circuit Television (CCTV)	TP	13/02/08- ECHR 13/02/08 - FOIA	None	21/04/08	13/02/08
<b>D12</b>	Children at Risk	Crime	11/08/06- ECHR 11/08/06 - FOIA	None	20/11/07	11/08/06
<b>D14</b>	Recruitment, Selection, Induction &	HR	14/05/09- ECHR 14/05/09-	2	08/04/09	14/05/09

Policy	Title	Policy Owner	Dates of ECHR Audit FOIA Audit	Relevant to General Duty 3 = Little 2 = Some 1 = A lot	Last annual review or update	RR(A)A Audit carried out
	Probation : Police Staff and Volunteers		FOIA			
<b>D15</b>	Clothing and Equipment	Procurement	13/01/09– ECHR 13/01/09– FOIA	None	30/01/09	13/01/09
<b>D16</b>	Command and Control Of Incidents	Operations - Contingency Planning	10/08/06– ECHR 10/08/06– FOIA	None	21/01/09	10/08/06
<b>D18</b>	Commendation, Honours and Awards	HR	07/06/07– ECHR 07/06/07- FOIA	None	20/06/07	07/06/07
<b>D19</b>	Radio & Telecommunication Systems	ICT	28/07/09 – ECHR 28/07/09 - FOIA	None	03/08/09	28/07/09
<b>D20</b>	Technical Surveillance Unit	Crime	22/08/08– ECHR 22/08/08 - FOIA	None	30/04/09	22/08/08
<b>D21</b>	Public complaints against Police Officers Police Staff and members of the Special Constabulary	Professional Standards	27/04/05– ECHR 27/04/05-FOIA	1	20/12/06	27/04/05
<b>D22</b>	Corruption in the Public Sector	Crime	03/04/08 – ECHR 03/04/08 - FOIA	None	01/06/09	03/04/08
<b>D23</b>	Honour Based Violence	Crime	29/05/09 – ECHR 29/05/09 - FOIA	None	23/07/09	29/05/09
<b>D24</b>	Crime Reporting	Crime	29/05/09– ECHR 29/05/09-FOIA	None	30/07/09	29/05/09
<b>D25</b>	Handling Intelligence	Crime	02/08/07 – ECHR 02/08/07 – FOIA	None	31/07/07	02/08/07
<b>D26</b>	Health and Safety – Stress Management	HR	28/07/06– ECHR 28/07/06-FOIA	None	18/08/06	28/07/06

<b>Policy</b>	<b>Title</b>	<b>Policy Owner</b>	<b>Dates of ECHR Audit FOIA Audit</b>	<b>Relevant to General Duty 3 = Little 2 = Some 1 = A lot</b>	<b>Last annual review or update</b>	<b>RR(A)A Audit carried out</b>
<b>D28</b>	Bonus Payments Policy	HR	14/01/08 - ECHR 14/01/08 - FOIA	None	15/01/08	14/01/08
<b>D29</b>	Method of Entry	Operations	12/10/07- ECHR 12/10/07-FOIA	None	24/06/09	12/10/07
<b>D30</b>	Dangerous Dogs	Operations	22/08/08- ECHR 22/08/08-FOIA	None	18/09/08	22/08/08
<b>D31</b>	Data Protection	Information Management	30/10/00- ECHR 06/01/04-FOIA	None	04/11/04	22/03/02
<b>D32</b>	Records Management Policy	Information Management	28/03/07- ECHR 28/03/07-FOIA	None	30/04/07	28/03/07
<b>D33</b>	Diplomatic Immunities and Privileges	Operations	23/01/07- ECHR 23/01/07-FOIA	None	17/06/09	23/01/07
<b>D34</b>	Domestic Abuse	Crime	20/06/07- ECHR 20/06/07-FOIA	None	28/04/09	20/06/07
<b>D35</b>	Transport Impairment (Alcohol/Drug related)	Operations	13/05/08 - ECHR 13/05/08 - FOIA	None	12/05/08	13/05/08
<b>D36</b>	Misuse of Drugs	Crime	22/08/05- ECHR 22/08/05-FOIA	None	19/12/07	22/08/05
<b>D37</b>	Attendance Management Policy	HR	30/10/08 - ECHR 30/10/08 - FOIA	None	03/11/08	30/10/08
<b>D39</b>	Equal Opportunities & Diversity	HR	15/08/00- ECHR 19/01/05-FOIA	3	17/02/05	18/04/02
<b>D40</b>	Certification, Registration & Licensing of Stores for Explosives Acquisition & Keeping & Reporting Procedures	TP	11/06/08 - ECHR 11/06/08 - FOIA	None	01/09/08	11/06/08
<b>D41</b>	Sponsored Learning	HR	19/06/07- ECHR	None	18/01/08	19/06/07

Policy	Title	Policy Owner	Dates of ECHR Audit FOIA Audit	Relevant to General Duty 3 = Little 2 = Some 1 = A lot	Last annual review or update	RR(A)A Audit carried out
			19/06/07-FOIA			
D42	Federation	HR	02/05/08 – ECHR 02/05/08 - FOIA	None	10/11/00*	02/05/08
D44	Firearm Licensing	TP	13/06/08 - ECHR 13/06/08 - FOIA	None	13/11/08	13/06/08
D45	Fires	Crime	21/05/08 - ECHR 21/05/08 – FOIA	None	17/09/08	21/05/08
D46	Fixed Penalty & Conditional Offer Scheme – Driving Offences	Criminal Justice	20/04/07 - ECHR 20/04/07 – FOIA	None	02/09/09	20/04/07
D47	Football and Major Sporting Events	Operations - Contingency Planning	09/11/04 - ECHR 09/11/04 - FOIA	3	13/03/08	09/11/04 (full IA - 25/10/06)
D48	Health & Safety - First Aid at work	HR	06/05/09 - ECHR 06/05/09 – FOIA	None	24/06/09	06/05/09
D51	Graded Response	Call Management & Comms	20/03/09 - ECHR 20/03/09 – FOIA	3	23/03/09	20/03/09
D52	Military Forces	Criminal Justice	30/06/09 - ECHR 30/06/09- FOIA	None	01/07/09	30/06/09
D53	External Use of Police Images	Information Management	01/05/07 – ECHR 01/05/07 – FOIA	None	23/06/09	01/05/07
D54	Hostage Taking and Product Contamination	Crime	15/10/07 - ECHR 15/10/07 – FOIA	None	17/07/09	15/10/07
D56	Interception of Communications in H M Prisons	Crime	04/12/08 - ECHR 04/12/08 – FOIA	None	08/12/08	04/12/08

Policy	Title	Policy Owner	Dates of ECHR Audit FOIA Audit	Relevant to General Duty 3 = Little 2 = Some 1 = A lot	Last annual review or update	RR(A)A Audit carried out
D58	Immigration Control	Crime	08/01/08 - ECHR 08/01/08 - FOIA	None	09/01/08	08/01/08
D59	Petty Cash and Cash Advances	Finance	14/06/07 - ECHR 14/06/07 - FOIA	None	19/06/07	14/06/07
D60	Income to Official Funds & Charitable Donations	Finance	13/10/00 - ECHR FOIA due	3	22/12/00*	10/05/02
D61	Health & Safety (OHSU) Infectious Diseases	HR (OHSU)	01/08/07- ECHR 01/08/07- FOIA	None	24/08/07	01/08/07
D62	Covert Human Intelligence Sources	Crime	22/08/06 - ECHR 22/08/06- FOIA	None	16/01/09	22/08/06
D64	Interpol	Crime	27/03/07 - ECHR 27/03/07 - FOIA	None	17/08/09	27/03/07
D65	Force Portable Alarm Installation Policy	CMCD	19/11/08 - ECHR 19/11/08 - FOIA	None	08/06/09	19/11/08
D66	Inventories	Finance	13/10/00 - ECHR FOIA due	04/06/07	17/06/01* Policy suspended	10/05/02 Policy suspended
D68	The provision and wearing of overt body armour (interim policy)	Operations	17/07/09- ECHR 17/07/09 - FOIA	None	17/07/09	17/07/09
D69	Liquor Licensing including Betting, Gaming and Lotteries	TP	28/10/06 - ECHR 28/10/06 - FOIA	None	23/01/08	28/10/06
D71	Media Liaison	Corporate Comms	13/06/01 - ECHR FOIA due	1	23/10/03	22/03/02
D72	The Management, Recording & Investigation of Missing Persons	Crime	09/01/06 - ECHR 09/01/06 - FOIA	None	16/06/08	09/01/06

Policy	Title	Policy Owner	Dates of ECHR Audit FOIA Audit	Relevant to General Duty 3 = Little 2 = Some 1 = A lot	Last annual review or update	RR(A)A Audit carried out
D73	Negotiators	Crime	17/12/08 - ECHR 17/12/08 - FOIA	None	24/12/08	17/12/08
D75	Adult Protection/ Safeguarding Adults	Crime	31/07/08 – ECHR 31/07/08 - FOIA	None	13/08/09	31/07/08
D76	Police Search Operations	Operations - Contingency Planning	18/01/08 - ECHR 18/01/08 – FOIA	None	09/02/09	18/01/08
D77	Student Police Officers	HR	23/04/07 - ECHR 23/04/07- FOIA	None	30/08/07	23/04/07
D79	PNC	Crime	23/01/07 - ECHR 23/01/07 - FOIA	None	28/08/09	23/01/07
D80	Pocket Books	Criminal Justice	10/11/06 - ECHR 10/11/06 - FOIA	None	03/03/09	10/11/06
D81	Police Personnel involved in Road Traffic Collisions	Operations	23/12/08 - ECHR 23/12/08 - FOIA	None	22/12/08	23/12/08
D82	Healthcare Professionals (Police Surgeons & Custody Nurses)	Criminal Justice	03/04/08 - ECHR 03/04/08 - FOIA	None	17/08/09	03/04/08
D83	Police Use of Firearms: Operational	Operations	12/05/08 - ECHR 12/05/08 - FOIA	3	02/07/09	12/05/08 Full IA 27/10/06
D85	Police Vehicles: Care & Maintenance – Fuel for Police Vehicles – Use of Force Bicycles	Transport Services Dept	08/07/09- ECHR 08/07/09- FOIA	None	14/07/09	08/07/09
D86	Police Vehicles: Drivers & Usage	Operations	09/11/06 - ECHR 09/11/06 - FOIA	None	20/05/09	09/11/06

Policy	Title	Policy Owner	Dates of ECHR Audit FOIA Audit	Relevant to General Duty 3 = Little 2 = Some 1 = A lot	Last annual review or update	RR(A)A Audit carried out
D88	Family Leave Policy	HR	26/02/08- ECHR 26/02/08- FOIA	None	13/03/08	26/02/08
D89	Prison Interviews & Production	Crime	23/04/08 - ECHR 23/04/08 - FOIA	None	09/07/09	23/04/08
D91	Access to Middlemoor Site	Estates	03/10/00 - ECHR FOIA due	3	14/11/00*	04/02/02
D92	Staff Support Groups	HR	12/05/05 – ECHR 12/05/05 – FOIA	2	18/07/05	12/05/05
D93	Promotions Policy	HR	16/12/08- ECHR 16/12/08- FOIA	3	06/03/09	16/12/08 Equality Impact assessment
D94	Force Property Handling Policy	Finance	26/03/08 - ECHR 26/03/08 - FOIA	None	08/04/08	26/03/08
D97	Public Order & Training	Operations	21/08/09 - ECHR 21/08/09 - FOIA	None	12/08/09	21/08/09
D98	Purchasing	Procurement	30/07/07 – ECHR 30/07/07 - FOIA	None	16/10/08	30/07/07
D99	Audio and Video Tape-Recorded Interviews	Criminal Justice	19/05/09 - ECHR 19/05/09 - FOIA	None	29/05/09	19/05/09
D100	Family Liaison	Crime	16/06/09 - ECHR 16/06/09- FOIA	3	08/04/09	16/06/09 Race Impact Assessment 16/06/09
D102	Sexual Offence Liaison Officer	Crime	16/05/05 - ECHR 16/05/05 - FOIA	None	20/08/07	16/05/05
D103	Recruitment of Constables	HR	23/10/07– ECHR 23/10/07– FOIA	None	12/11/07	23/10/07

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<b>D105</b>	Scientific Support Unit & Forensic Examination	Crime	06/11/06 - ECHR 06/11/06 - FOIA	None	22/12/06	06/11/06
<b>D106</b>	Saluting	HR	13/01/04 - ECHR 13/01/04 - FOIA	3	08/05/06	13/01/04
<b>D108</b>	Youth Policy	TP	24/10/08 - ECHR 24/10/08 - FOIA	2	04/03/09	24/10/08 IA – 14/11/08
<b>D110</b>	Security of Police Premises - Force Threat & Response Levels	Operations – Contingency Planning	14/12/06 – ECHR 14/12/06 - FOIA	None	09/04/09	14/12/06
<b>D112</b>	Officer Safety, Handcuffs and other limb restraints, Batons & Captor Incapacitant Sprays	Operations	01/05/07 – ECHR 01/05/07 - FOIA	None	28/11/08	01/05/07
<b>D113</b>	Major Incidents : Payment for Police Staff Volunteers	HR	17/03/06 – ECHR 17/03/06 - FOIA	None	12/11/07	17/03/06
<b>D114</b>	Health & Safety - Smoking at Work	HR	12/03/09 – ECHR 12/03/09 – FOIA	None	17/03/09	12/03/09
<b>D115</b>	Special Constabulary	TP	07/04/09 – ECHR 07/04/09 - FOIA	2	17/06/09	08/04/09 (full race impact assessment)
<b>D116</b>	Speeding Offences	Operations	27/08/09– ECHR 27/08/09– FOIA	None	12/08/09	27/08/09
<b>D117</b>	Sponsorship	Finance	23/05/05 – ECHR 23/05/05 – FOIA	3	22/12/06	23/05/05
<b>D118</b>	Sporting and other Force representative activities	HR	07/04/08 – ECHR 07/04/08 - FOIA	None	08/04/08	07/04/08

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D119	Standards of Dress and Appearance	TP	10/11/08 – ECHR 10/11/08 – FOIA	2	02/03/09	11/11/08 (full race impact assessment)
D121	Sudden Deaths	Crime	10/04/06 – ECHR 10/04/06 – FOIA	None	08/08/08	10/04/06
D123	Supply of Information to Outside Parties	Information Management	14/04/09 – ECHR 14/04/09 – FOIA	None	07/08/09	14/04/09
D124	Surveillance	Crime	16/08/07 – ECHR 16/08/07 – FOIA	None	11/11/08	16/08/07
D127	Carnival Processions	Operations – Contingency Planning	12/12/06 – ECHR 12/12/06 – FOIA	3	14/11/07	14/02/07 Full IA 06/02/07
D130	Unofficial Funds	Finance	14/06/07 – ECHR 14/06/07 - FOIA	None	19/06/07	14/06/07
D132	Vehicle Defect Rectification Scheme	Criminal Justice	30/05/07 – ECHR 30/05/07 - FOIA	None	27/05/09	30/05/07
D133	Vehicle Examinations & Prohibitions	Operations	30/06/08 – ECHR 30/06/08 – FOIA	None	01/09/09	30/06/08
D134	Vehicle Recovery and the Force Recovery	Transport Dept	15/09/08 – ECHR 15/09/08 - FOIA	None	24/09/08	15/09/08
D135	Victim and Witness Care	Criminal Justice	20/08/09 – ECHR 20/08/09 - FOIA	None	20/08/09	20/08/09
D137	Tactical Aid Group	Operations	24/03/09– ECHR 24/03/09- FOIA	None	27/03/09	24/03/09
D138	Criminal Cases Review Commission	Business Improvement	13/10/08– ECHR 13/10/08- FOIA	None	16/10/08	13/10/08

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<b>D139</b>	Health & Safety - Personal Protective Equipment	HR	22/07/09 – ECHR 22/07/09 - FOIA	None	23/07/09	22/07/09
<b>D140</b>	Mental Health Issues	Criminal Justice	14/10/03 – ECHR 14/10/03 - FOIA	2	31/01/07	14/10/03
<b>D141</b>	Abandoned Explosives and Ordnance	Operations - Contingency Planning	05/12/06– ECHR 05/12/06- FOIA	None	03/06/09	05/12/06
<b>D142</b>	Career Break and Extended Unpaid Leave - Police Officers	HR	22/11/06 – ECHR 22/11/06 - FOIA	None	09/04/09	22/11/06
<b>D143</b>	Road Death Investigation	Operations	21/05/08 – ECHR 21/05/08 - FOIA	None	06/05/09	21/05/08
<b>D144</b>	Police Dogs and Their Use	Operations	24/03/09 – ECHR 24/03/09 - FOIA	None	10/03/09	24/03/09
<b>D145</b>	Air Operations Unit	Operations	22/04/09 – ECHR 22/04/09 – FOIA	None	17/03/09	22/04/09
<b>D146</b>	Mentoring	HR	15/11/07 – ECHR 15/11/07 - FOIA	None	20/11/07	15/11/07
<b>D147</b>	Management of Police Pursuits	Operations	17/04/09 – ECHR 17/04/09 - FOIA	None	01/05/09	17/04/09
<b>D148</b>	Detention, Treatment & Arrest	Criminal Justice	31/07/09 – ECHR 31/07/09 - FOIA	None	13/08/09	31/07/09
<b>D149</b>	Security – Communication Procedures & Status Codes	CMCD	05/12/08 – ECHR 05/12/08 - FOIA	None	19/06/08	05/12/08
<b>D152</b>	Part Time & Flexible Working Policy	HR	15/03/06 – ECHR 15/03/06 - FOIA	None	10/06/08	15/03/06

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D154	Tenure Policy	HR	31/10/05 – ECHR 31/10/05 – FOIA	None	20/05/09	31/10/05
D155	Contingency Plans	Operations	20/11/07– ECHR 20/11/07- FOIA	None	26/11/07	20/11/07 (full IA - 25/02/07)
D156	Health & Safety - Risk Assessments	HR	25/02/08 - ECHR 25/02/08 - FOIA	None	06/03/08	25/02/08
D157	Wildlife Crime and Illegal Hunting	Operations	05/11/07 – ECHR 05/11/07 - FOIA	None	09/04/09	05/11/07
D158	Transport of Detainees	Criminal Justice	07/11/06 – ECHR 07/11/06 - FOIA	None	31/03/09	07/11/06
D160	Police Writing	Corporate Comms	29/08/00 - ECHR FOIA due	None	12/06/02	22/03/02
D161	Force Forms	Citizen Focus	06/07/07 – ECHR 06/07/07 - FOIA	None	10/07/07	06/07/07
D163	Protected Learning	HR	07/06/07 – ECHR 07/06/07 – FOIA	None	20/06/07	07/06/07
D165	Professional Development : Police Officers	HR	4/08/09– ECHR 4/08/09- FOIA	None	24/08/09	24/08/09
D166	Operational Orders	Operations - Contingency Planning	30/12/03 – ECHR 30/12/03 - FOIA	1	07/02/08	30/12/03 18/10/06 (+full impact assessment)
D167	Management of Ill Health (Police Officers)	HR	26/01/04- ECHR 26/01/04- FOIA	None	03/02/04	14/07/04
D169	Interpreters, Plus Consular and Commonwealth Posts	Criminal Justice	07/07/09 – ECHR 07/07/09 -	None	04/03/09	07/07/09

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			ECHR			
D170	Operational Informations	Call Man. and Comms	20/03/06 – ECHR 20/03/06 – FOIA	None	20/12/06	20/03/06
D171	Protected Witnesses	Crime	10/04/08 - ECHR 10/04/08 - FOIA	None	03/07/08	10/04/08
D175	Annual Leave, Public/Bank Holidays: Police Officers	HR	23/04/07 – ECHR 23/04/07 - FOIA	None	08/04/08	23/04/07
D177	DNA – Deoxyribonucleic Acid	Crime	07/01/08 – ECHR 07/01/08 – FOIA	None	10/01/08	07/01/08
D178	Business Interests	Professional Standards	12/08/08 - ECHR 12/08/08- FOIA	None	17/07/09	12/08/08
D180	Decoy Policy	Crime	19/06/07 – ECHR 19/06/07 – FOIA	None	16/04/08	19/06/07
D182	Premature Retirement - Support Staff Pension Scheme	HR	29/10/01 – ECHR FOIA due		Policy Suspended on 26/5/06	18/04/02 3
D183	Raves, Music Events and Festivals	Operations - Contingency Planning	14/03/07 – ECHR 14/03/07 – FOIA	3	04/06/09	14/03/07 Full Impact Assessment 19/03/07
D185	Reports on Character and Convictions	Crime	02/05/08 – ECHR 02/05/08 – FOIA	None	17/06/09	02/05/08
D186	Health & Safety Management of Visiting Contractors to Force Premises	HR	09/06/08- ECHR 09/06/08 - FOIA	None	10/06/08	09/06/08
D187	Health & Safety Management of Electrical Equipment	HR	23/04/07 - ECHR 23/04/07 – FOIA	None	25/04/07	23/04/07

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D189	Security Vigilance Areas	Crime	16/08/07 – ECHR 16/08/07 - FOIA	None	04/11/08	16/08/07
D191	Driving & Driver Training	Operations	05/07/07 – ECHR 05/07/07 – FOIA	None	04/06/09	05/07/07
D192	Gold Control Policy	Operations	03/06/09 – ECHR 03/06/09 – FOIA	None	02/06/09	03/06/09
D193	Maritime Incidents – Jurisdiction	Criminal Justice	13/07/07 – ECHR 13/07/07 – FOIA	None	09/09/08	13/07/07
D194	Conditional Cautioning	Criminal Justice	21/07/09 – ECHR 21/07/09 – FOIA	None	27/07/09	21/07/09
D195	Prisons	Operations – Contingency Planning	25/09/07 – ECHR 25/09/07 – FOIA	None	08/07/09	25/09/07
D196	Operational Orders (Crime)	Crime	21/01/09 – ECHR 21/01/09 – FOIA	None	26/01/09	21/01/09
D197	Health and Safety Management Policy	HR	29/10/08 – ECHR 29/10/08 – FOIA	None	05/11/08	29/10/08
D198	Automatic Number Plate Recognition System	Operations	17/04/07- ECHR 17/04/07- FOIA	3	29/10/08	17/04/07 +Impact Assessment
D199	Restorative Justice	TP	12/06/07 - ECHR 12/06/07 - FOIA	None	12/08/09	12/06/07
D200	Neighbourhood Policing Teams – Abstraction Policy	TP	05/12/07- ECHR 05/12/07- FOIA	None	14/03/08	05/12/07
D201	Fast Track Medical Intervention	HR	24/10/07 – ECHR 24/10/07 – FOIA	None	15/11/07	24/10/07

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<b>D202</b>	Safety Incident Reporting and Investigation	HR	22/09/08 – ECHR 22/09/08 – FOIA	None	23/09/08	22/09/08
<b>D203</b>	Removal expenses/Occupation of Property: Police Officers & Support Staff	Finance	13/06/03 – ECHR 13/06/03 – FOIA	None	03/09/07	19/04/02
<b>D204</b>	Identification of Drivers by Photograph & Thumbprint: HO/RT1 & HO/RT2	Criminal Justice	04/06/07 – ECHR 04/06/07 – FOIA	None	1/07/09	04/06/07
<b>D205</b>	Seconded Officers	HR	08/11/07 – ECHR 08/11/07 – FOIA	None	09/04/09	08/11/07
<b>D206</b>	Closed Circuit Television – Ports (CCTV)	Crime	02/10/07 – ECHR 02/10/07 – FOIA	None	16/04/08	02/10/07
<b>D207</b>	Duty Overseas	HR	08/11/07 – ECHR 08/11/07 - FOIA	None	20/11/07	08/11/07
<b>D209</b>	PCSO Driving Policy	Operations	20/01/09 - ECHR 20/01/09 - FOIA	None	20/03/09	20/01/09
<b>D210</b>	Use of Sports and Exercise Facilities by external users	HR	10/12/08 – ECHR 10/12/08 – FOIA	None	30/01/09	10/12/08
<b>D214</b>	Probationary Period – Sergeant	HR	20/11/07 – ECHR 20/11/07 - FOIA	None	11/12/08	20/11/07
<b>D215</b>	Driver Improvement & Speed Awareness Schemes	Operations	14/05/07– ECHR 14/05/07– FOIA	None	21/05/07	14/05/07
<b>D217</b>	Health & Safety Fire Safety Management	HR	12/10/07– ECHR 12/10/07– FOIA	None	25/10/07	12/10/07
<b>D219</b>	Use of Force Computer	Information Manageme	18/12/08 – ECHR	None	19/12/08	18/12/08

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	Systems by Outside Agencies	nt	18/12/08 - FOIA			
<b>D223</b>	Reporting of Suspected Irregularities to the Treasurer	Finance	01/06/07 – ECHR 01/06/07 FOIA	None	06/06/07	01/06/07
<b>D224</b>	Major Investigation Guidelines	Crime	19/04/06 – ECHR 19/04/06 – FOIA	3	10/06/08	19/04/06
<b>D225</b>	Ministry of Defence Police Concordat	Operations – Contingency Planning	22/08/05 – ECHR 22/08/05 – FOIA	None	12/12/06	22/08/05
<b>D226</b>	Rape and Other Serious Sexual Offences	Crime	20/09/06– ECHR 20/09/06- FOIA	None	12/09/07	20/09/06
<b>D227</b>	Driving of Police Vehicles in an Emergency	Operations	15/05/07 – ECHR 15/05/07 – FOIA	None	17/09/08	15/05/07
<b>D228</b>	Grant Fund Application Policy	Finance	29/08/00 – ECHR FOIA due	Policy Suspended on 18/06/07	17/01/03 Policy Suspended on 18/06/07	27/03/02
<b>D229</b>	Sex Offenders Register	Crime	04/05/07 – ECHR 04/05/07 – FOIA	None	27/05/08	04/05/07
<b>D230</b>	Health & Safety: Display Screen Equipment	HR	11/11/05 – ECHR 11/11/05 – FOIA	None	19/12/07	11/11/05
<b>D231</b>	Force Covert Structure	Crime	12/04/06 – FOIA 12/04/06 – ECHR	None	28/05/08	12/04/06
<b>D232</b>	Compliance & Procedures for Covert Policing Activity	Crime	28/07/05 – ECHR 28/07/05 – FOIA	None	10/06/09	28/07/05
<b>D233</b>	Checks in Relation to Irish and International Terrorism by Non Special Branch Officers	Operations	11/05/07 – ECHR 11/05/07 – FOIA	None	13/01/09	11/05/07

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D234	Requests for communications data, dealing with nuisance and malicious calls and liaison with CSP	Crime	17/04/07 – ECHR 17/04/07 – FOIA	None	25/05/07	17/04/07
D235	Test Purchasing	Crime	26/09/07 – ECHR 26/09/07 – FOIA	None	27/09/07	26/09/07
D236	Force Target Criminal Policy	Crime	23/04/08– ECHR 23/04/08– FOIA	None	15/08/06	23/04/08
D237	Industrial Incidents	Crime	11/08/06 – ECHR 11/08/06 – FOIA	None	12/05/08	11/08/06
D238	Postings Policy	HR	13/03/08 – ECHR 13/03/08 - FOIA	None	13/03/08	13/03/08
D240	Incidents Involving CBRN Agents	Operations – Contingency Planning	02/09/09- ECHR 02/09/09– FOIA	None	03/09/09	02/09/09
D241	Post Incident Procedures (Firearms & less lethal options)	Operations	20/06/07 – ECHR 20/06/07 – FOIA	None	08/09/08	20/06/07
D242	Use of Handheld Digital Recorders	Operations	08/04/08- ECHR 08/04/08-FOIA	None	11/08/09	08/04/08
D243	Equality of Service Delivery	Diversity	29/07/08– ECHR 29/07/08 - FOIA	1	08/08/08	29/07/08
D244	Employing People with a Disability	HR	18/06/07 – ECHR 18/06/07 – FOIA	3	26/11/07	18/06/07 Race IA 16/11/07
D245	Complaints about Direction and Control	Professional Standards	27/04/05 – ECHR 27/04/05 – FOIA	1	14/10/05	27/04/05

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D246	Purchase of IT Equipment and Peripherals	ICT	27/07/09 – ECHR 27/07/09 – FOIA	None	03/08/09	27/07/09
D248	Work Experience & Student Placements Policy	HR	15/08/05 – ECHR 15/08/05 – FOIA	1	10/04/06	15/08/05
D251	Police Handling of Terrorist Prisoners	Crime	16/01/06 – ECHR 16/01/06 – FOIA	3	14/04/08	16/01/06
D252	Health & Safety – Control and Management of Asbestos	HR	12/03/08 – ECHR 12/03/08 – FOIA	None	16/04/08	12/03/08
D254	Redundancy Policy: Police Staff	HR	16/08/08 – ECHR 16/08/08 - FOIA	None	08/04/09	16/08/08
D255	Force Insurance Policies	Finance	01/08/07– ECHR 01/08/07- FOIA	None	05/11/08	01/08/07
D257	Charging for Police Services	Finance	11/08/05 – ECHR 11/08/05 – FOIA	None	04/01/08	11/08/05
D258	Anti-Social Behaviour Orders	TP	23/06/06 – ECHR 23/06/06 - FOIA	3	11/04/07	23/06/06
D260	Information Security Policy	Information Management	15/04/09– ECHR 15/04/09– FOIA	None	16/04/09	15/04/09
D263	Gifts and Hospitality	HR	27/10/06 – ECHR 27/10/06 - FOIA	None	17/10/07	27/10/06
D264	Career breaks – support staff	HR	18/10/00 – ECHR FOIA due	Policy Suspended 3/3/06	Policy Suspended 3/3/06	18/04/02
D265	Health & Safety: Manual Handling	HR	06/05/09– ECHR 06/05/09– FOIA	None	20/05/09	06/05/09

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<b>D266</b>	Youth Justice Policy	Criminal Justice	02/03/07 – ECHR 02/03/07 – FOIA	None	04/06/09	02/03/07
<b>D267</b>	Exit from Employment Policy	HR	19/10/07 – ECHR 19/10/07 – FOIA	None	18/10/07	19/10/07
<b>D268</b>	Force Call Handling Policy	Call Management & Comms	24/08/09– ECHR 24/08/09– FOIA	None	12/08/09	24/08/09
<b>D269</b>	Business Continuity Management	Operations	07/08/08– ECHR 07/08/08– FOIA	None	08/08/08	07/08/08
<b>D270</b>	Health & Safety Control of Substances Hazardous to health	HR	13/07/07 – ECHR 13/07/07 – FOIA	None	30/08/07	13/07/07
<b>D271</b>	Warrants Management Policy	CJD	09/11/06 - ECHR 09/11/06 - FOIA	None	12/09/08	09/11/06
<b>D273</b>	Fairness at Work: Grievance, Anti-Harassment & Anti-bullying	HR	08/06/07 – ECHR 08/06/07 – FOIA	None	25/06/07	08/06/07
<b>D274</b>	Emergency Staffing Policy	HR	27/05/09 – ECHR 27/05/09 – FOIA	None	20/07/09	27/05/09
<b>D275</b>	Health & Safety: Noise at Work	HR	16/05/08 – ECHR 16/05/08 – FOIA	None	30/05/08	16/05/08
<b>D276</b>	Obtaining & Recording Witness Testimony	Crime	07/03/06 – ECHR 07/03/06 – FOIA	None	10/08/07	07/03/06
<b>D280</b>	Drug Referral Schemes	TP	27/04/04 – ECHR 27/04/04- FOIA	None	21/04/08	27/04/04
<b>D281</b>	Protection from Harassment Act	Crime	30/08/06 – ECHR	None	26/09/07	30/08/06

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	1997		30/08/06 – FOIA			
<b>D283</b>	Counterfeit Currency	Crime	24/08/06– ECHR 24/08/06– FOIA	None	19/08/08	24/08/06
<b>D284</b>	Rope Access	Ops	03/10/07 – ECHR 03/10/07 - FOIA	None	11/10/07	03/10/07
<b>D285</b>	Hate Crime Policy	Crime	20/11/06 – ECHR 20/11/06 - FOIA	None	17/07/07	20/11/06
<b>D286</b>	Unauthorised Encampments	TP	18/02/09 – ECHR 18/02/09 – FOIA	1	24/06/09	18/02/09 IA – 19/6/09
<b>D289</b>	Persons with Disabilities	Diversity	21/06/01 – ECHR FOIA due	3	23/10/02	17/04/02
<b>D290</b>	Anti-Social Behaviour & Escalation	TP	23/06/05 – ECHR 23/06/05 – FOIA	3	19/08/05	23/06/05
<b>D292</b>	Dept for work & Pension DWP - Exchange of Information	Crime	24/04/09 – ECHR 24/10/09 – FOIA	None	06/05/09	24/04/09
<b>D295</b>	Major Investigations – Intelligence Cells	Crime	18/06/07 – ECHR 18/06/07-FOIA	None	09/10/08	18/06/07
<b>D296</b>	Evidential Digital Imaging	Crime	14/12/07 – ECHR 14/12/07 - FOIA	None	03/06/09	14/12/07
<b>D297</b>	Transferee Recruitment	HR	22/12/06– ECHR 22/12/06 - FOIA	None	09/04/09	22/12/06
<b>D298</b>	The Crime & Disorder Act 1998 - Local Child Curfews	TP	18/06/07 – ECHR 18/06/07 – FOIA	None	21/04/08	18/06/07
<b>D300</b>	Taking of Fingerprints and DNA from Police	HR	12/10/05 – ECHR 12/10/05 –	None	20/08/07	12/10/05

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	Officers, Special Constable, Police Community Support Officers and Other Police Staff		FOIA			
<b>D301</b>	Health & Safety : Work Equipment	HR	25/03/09 – ECHR 25/03/09 – FOIA	None	31/03/09	25/03/09
<b>D303</b>	Religion and Belief : Needs of Staff	HR	06/08/03 – ECHR 06/08/03 – FOIA	3	16/02/05	06/08/03
<b>D304</b>	Vulnerable and Intimidated Witnesses Youth Justice and Criminal Evidence Act 1999 – General Guidance	Crime	22/02/08 – ECHR 22/02/08 - FOIA	None	13/03/08	22/02/08
<b>D305</b>	Forfeiture of Computer Equipment	Crime	17/06/09 – ECHR 17/06/09 – FOIA	None	18/06/09	17/06/09
<b>D307</b>	HM Revenue & Customs – Accessing Information	Crime	19/12/07 – ECHR 19/12/07 – FOIA	None	12/12/08	19/12/07
<b>D309</b>	Dealing with cases of Force Marriages	Crime	07/02/06 – ECHR 07/02/06 – FOIA	None	20/06/07	07/02/06
<b>D311</b>	Alcohol and Drug Misuse Policy	PSD	09/09/08– ECHR 09/09/08– FOIA	None	10/09/08	09/09/08
<b>D312</b>	Dealing with Artifice Crime and Elderly/Vulnerable Victims	Crime	17/03/08 – ECHR 17/03/08 - FOIA	None	17/03/08	17/03/08
<b>D313</b>	Information Sharing Policy	Information Management	14/02/07- ECHR 14/02/07- FOIA	None	28/11/08	14/02/07
<b>D315</b>	Discipline Policy – Police Staff	HR	11/03/09 - ECHR 11/03/09 – FOIA	3	16/04/09	11/03/09

<b>Policy</b>	<b>Title</b>	<b>Policy Owner</b>	<b>Dates of ECHR Audit FOIA Audit</b>	<b>Relevant to General Duty 3 = Little 2 = Some 1 = A lot</b>	<b>Last annual review or update</b>	<b>RR(A)A Audit carried out</b>
<b>D316</b>	Electronic Monitoring of Offenders	Crime	09/08/07 – ECHR 09/08/07 – FOIA	None	25/11/08	09/08/07
<b>D317</b>	Passport Agency Exchange of Information	Crime	02/02/07 – ECHR 02/02/07 – FOIA	None	23/04/09	02/02/07
<b>D320</b>	Mobile Visual Recording Equipment Policy & Procedures for Deployment	Crime	15/06/07 – ECHR 15/06/07 – FOIA	None	18/11/08	15/06/07
<b>D321</b>	NHS counter Fraud Service – Investigation and Exchange of Information	Crime	01/02/07 – ECHR 01/02/07 – FOIA	None	06/02/08	01/02/07
<b>D322</b>	Seizure and Forfeiture of Terrorist Cash	Crime	30/08/07 – ECHR 30/08/07 – FOIA	None	30/08/07	30/08/07
<b>D323</b>	Search and Seizure of Cash – Part V Proceeds of Crime Act 2002	Crime	30/07/07 – ECHR 30/07/07 – FOIA	None	23/09/08	30/07/07
<b>D324</b>	Joint Investigation Teams	Crime	19/06/07 - ECHR 19/06/07 – FOIA	None	08/09/08	19/06/07
<b>D325</b>	Sexual Behaviour in Public Places	Diversity	09/08/06– ECHR 09/08/06 - FOIA	None	22/08/06 (full IA)	09/08/06 (full IA)
<b>D326</b>	Death of Serving and Retired Police Officers, Special Constables and Police Staff	HR	19/04/08 – ECHR 19/04/08 - FOIA	None	11/02/09	19/04/08
<b>D327</b>	Powers for designated civilian & crime investigators, detention and escort officers (Police Staff & Others)	Crime	26/06/07 – ECHR 26/06/07 - FOIA	None	08/04/09	26/06/07
<b>D328</b>	Prolific & Other Priority Offenders	TP	08/04/08 – ECHR 08/04/08 - FOIA	None	15/04/08	08/04/08

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D329	Interview Advisors	Crime	19/06/08 – ECHR 19/06/08 – FOIA	None	16/04/08	19/06/08 22/08/08
D330	Serious Crime Analysis Section (SCAS), National Police Improvement Agency (NPIA), Centrex, Bramshill	Crime	12/12/08 – ECHR 12/12/08 - FOIA	None	16/12/08	12/12/08
D331	Force Confidence Procedure	HR	23/05/03 – ECHR 23/05/03 – FOIA	2	25/06/03	23/05/03
D332	Health & Safety - Diabetes Mellitus	HR Health & Safety	23/04/07 – ECHR 23/04/07 – FOIA	None	25/07/08	23/04/07
D333	Environmental Management	HR Health & Safety	08/08/07– ECHR 08/08/07 - FOIA	None	16/08/07	08/08/07
D334	Offences Taken into Consideration	Crime	15/08/06 – ECHR 15/08/06 – FOIA	None	16/08/06	15/08/06
D335	Street Robbery Investigations	Crime	11/12/06 – ECHR 11/12/06 – FOIA	None	03/07/08	11/12/06
D336	Force Vetting Policy	PSPD	15/06/07 – ECHR 15/06/07 – FOIA	None	16/06/09	15/06/07
D337	Capability Policy	HR	05/03/04 – ECHR 05/03/04 – FOIA  (audit received dated 23.10.07 awaiting annual review)	3  (this will change duty to None)	19/08/04	05/03/04
D338	Lawful Business Monitoring Policy	PSPD	16/04/04 – ECHR 16/04/04 – FOIA	None	28/05/04	16/04/04

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D339	Management of Threats to Human Life	Crime	29/04/09 – ECHR 29/04/09 – FOIA	None	30/04/09	29/04/09
D340	Penalty Notices for Disorder (PNDs)	Criminal Justice	12/06/09– ECHR 12/06/09– FOIA	none	11/06/09	12/06/09
D341	Abnormal Indivisible Loads (AIL) and Abnormal Vehicles	Operations	19/07/07 – ECHR 19/07/07 – FOIA	None	23/07/09	19/07/07
D343	Intelligence Led Integrity Testing	Professional Standards	10/08/04 – ECHR 10/08/04 – FOIA	3	20/03/07	10/08/04
D344	Out of Vehicle Safety	Operations	27/07/07 – ECHR 27/07/07 – FOIA	None	17/03/09	27/07/07
D345	Telephone/Mail Interception	Crime	14/11/07– ECHR 14/11/07– FOIA	None	22/11/07	14/11/07
D346	Working Time Regulations	HR	23/10/07 – ECHR 23/10/07 – FOIA	None	02/04/09	23/10/07
D347	Section 59/60 Police Reform Act Vehicle Seizures & Storage	Ops	27/02/08 – ECHR 27/02/08 – FOIA	None	29/09/08	27/02/08
D350	Critical Incident Management	Crime	12/01/05 – ECHR 12/01/05 – FOIA	None	28/08/07	12/01/05
D351	Stop, Stop and Search Policy	Crime	18/04/05 – ECHR 18/04/05 – FOIA	3	28/08/07	18/04/05 (+Impact Assessment)
D352	Water Related Incidents (Health & Safety)	HR	29/03/05 – ECHR 29/03/05 – FOIA	None	05/08/05	29/03/05
D353	The seizure, retention and disposal of vehicles driven by	Ops	19/03/08– ECHR 19/03/08–	None	04/12/08	19/03/08

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	uninsured/unlicensed drivers		FOIA			
<b>D354</b>	Armouries/Disposal of Firearms	Ops	06/02/09 – ECHR 06/02/09 – FOIA	None	17/07/09	06/02/09
<b>D355</b>	Professionalising Investigations Programme (PIP)	Crime	13/07/09- ECHR 13/07/09- - FOIA	None	14/07/09	13/07/09
<b>D356</b>	Police Response to Personal Attack (PA) Alarms	Ops	12/04/06 – ECHR 12/04/06 – FOIA	None	02/04/07	12/04/06
<b>D357</b>	Covert Internet Investigations (Crime Operations)	Crime	18/02/09 – ECHR 18/02/09 – FOIA	None	19/02/09	18/02/09
<b>D358</b>	Integrated Risk Management Policy	Performance & Business Improvement	09/06/09 – ECHR 09/06/09 – FOIA	None	11/06/09	09/06/09
<b>D359</b>	Disaster Victim Identification/Mass Fatalities	Operations	21/07/06 – ECHR 21/07/06 – FOIA	None	08/01/09	21/07/06
<b>D360</b>	'Taser' - Conducted Energy Devices (CEDs)	Operations	18/07/07 - ECHR 18/07/07 - FOIA	None	12/08/09	18/07/07
<b>D361</b>	Retention, Storage and Disposal of human tissue - Human Tissue Act 2004	Crime	05/06/07 - ECHR 05/06/07 - FOIA	2	31/08/07	05/06/07 IA - 07/06/07
<b>D362</b>	Re-deployment Policy	HR	04/06/08 - ECHR 04/06/08 - FOIA	None	04/06/08	04/06/08

