



**Devon & Cornwall Police
Policy Impact Assessment**

Assessment Date:	11/08/2016
Policy/Working Practice Title and Number	D074
Policy/Working Practice Version Date	24/08/17
Associated Working Practices	N/A
Name of Business Area and Lead	Alliance Prevention – Supt Matt Lawler
Name and contact details of person carrying out PIA	Force Policy Unit - 303598
PIA Publication Date	24/08/17
This PIA was last reviewed on:	N/A

Freedom of Information and Data Protection

Has the policy been FOI marked and exemptions identified?	Yes
Have the associated working practices been FOI marked and exemptions identified?	N/a
Does the policy refer to personal information?	No
Do the associated working practices refer to personal information?	N/a
Are time periods for retention or the process for removal and disposal defined in the document?	N/a
If no what legislation governs the retention and disposal of the personal information?	<ul style="list-style-type: none"> • Criminal Procedures and Investigations Act 1996 • Police Act 1996 (MoPI) • Limitations Act 1980 • Policy D032

Health and Safety

Do the policy or working practices have any health and safety implications for the public or staff?	Yes
If yes, are these covered by any of the <u>Generic Risk Assessments</u>? List GRA	Yes - GRA_04.12a, b and c

reference numbers where applicable	
Has advice been sought from Health and Safety or Occupational Health?	Yes
Name, date and comments received:	<p>The policy and working practices do have health and safety implications for the public and staff. However these are addressed in the current GRAs for cadets: GRA 04.12a Police Cadet Scheme GRA 04.12b Police Cadet Scheme – Helping with Events GRA 04.12c Police Cadet Scheme – Over Night Stays These GRAs were written in 2013 at the start of the Cadet scheme and it would probably be a good idea to review these in the light of how the scheme has progressed, developed and possibly changed.</p> <p>I would also suggest that whilst there is no requirement for the policy document itself to be subject of this QA it would be appropriate for some requirements to be mentioned in that policy document.</p> <p>Paragraph 3.3.6 states <i>‘Health and safety measures, as detailed in the manual of guidance, are in place to ensure cadets are able to experience a wide range of activities in a safe manner and that the wellbeing of cadets is prioritised at all times.’</i> I think it should go on to say that cadets must be provided with copies of GRA 04.12a when they first join. I appreciate they are given manuals but the manuals do not include the GRA and whilst they are available on the <i>Intranet</i> Cadets do not have access to the <i>Intranet</i> and would have to rely on being shown them by a cadet leader. As GRAs cover everything Cadets are involved in and all elements of their activities with the Force they should be able to refer to their GRA at anytime. I believe there is also a re-assurance aspect on this as well – as it would mean Cadets can share with their</p>

	<p>parents and guardians information about how the Force safeguards them whilst in its care.</p> <p>Equally, I believe Paragraph 3.3.7 should continue on to say a risk assessment should be drawn for every activity the cadets are involved with and participate in.</p> <p>Health & Safety Advisor Cornwall & Isles of Scilly (All Workstreams) Local Policing & Partnerships Stream Lead</p>

Equality Impact Initial Screening

<p>1. Significance & Impact: The relevance for equality depends on the nature and extent of the impact not just the numbers of people affected.</p>	
Do the proposals affect service users, employees or the wider community?	Yes
Do the proposals significantly affect service delivery, business processes or policy?	No
Does it involve a significant commitment of resources?	No
Do the proposals relate to an area where there are known inequalities? (e.g. hate crime, domestic abuse, accessibility, recruitment & progression)	Yes
<p>2. What is the purpose of the policy/working practice?</p> <p>This policy outlines the aims and objectives of the Devon and Cornwall Police Community Cadets Scheme and the expectations of any member of the organisation participating in the delivery of the scheme.</p>	
<p>3. Relevance: How does the aim and purpose of the policy/working practice relate to each of the aims of the public sector equality duty?</p> <p>This section must be fully completed for each PIA.</p>	
<p>a) To eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010</p>	<p>The CPC is committed to safeguarding the moral, psychological and physical welfare of children, regardless of gender, religion, race, ability, disability, sexuality or social background and to protecting them from any physical, emotional and sexual abuse or neglect.</p> <p>This policy emphasises the role of those involved in delivering cadets activities to safeguard young people</p>

	and the necessary actions regarding bullying and victimisation. The policy serves to protect both cadets and leaders.
b) To advance equality of opportunity between people from different groups	The national cadets strategy targets 25% cadet recruitment from vulnerable groups. DCP market cadet opportunity within YOT, local authority care, partnerships etc. The NVPC to which this policy is aligned recognise that focussing part of their engagement directly with young people who are vulnerable has the potential to promote better relationships between individuals, peer groups, families and communities.
c) To foster good relations between people from different groups.	An aim of the cadets provision is to enable young people within the community to liaise positively with other people in the community and from different groups. Additionally, the provision improves relations between the community and the police. The proposals contribute to the development of positive relationships and breaking down barriers between young people and the police; and through enhanced social action opportunities – young people, their communities and the communities they support. The NVPC to which this policy is aligned works to break down some of the perceptions include the stigma of volunteering, lack of appreciation of benefits of social action, general poor attitudes and prejudice towards young people.

4. Is it likely that the proposals could affect particular protected groups differently?

Age	Yes	Disability	No	Sexual Orientation	No
Race	No	Sex	No	Religion or Belief	No
Gender reassignment	No	Pregnancy and Maternity	No	Marriage or Civil Partnership Status	No

Please provide details for each protected group where you have indicated 'Yes'.

Age

The cadets is provided as an engagement opportunity for under 18s.

In terms of the other protected characteristics, this policy illustrates delivery of the cadets provision in an equitable manner ensuring engagement is accessible for all regardless of gender, religion, race, ability, disability, sexuality or social background.

3.3.2 When planning any CPC trip or visit, an inclusive approach must be adopted to ensure that all cadets are able to participate. A cadet should never be excluded from any activity or trip due to financial reasons.

3.3.4 Cadet leaders are required to make reasonable adjustments to avoid disabled participants being placed at a disadvantage.

Aspects in blue added by Corporate Equality and Diversity

External – Community

All – positive

Activity undertaken by cadets has a positive impact on individuals of all ages living within the catchment area of a Force cadet unit undertaking the action through e.g. improved engagement, better relationships with young people, better community cohesion etc.

All – negative

Communities, societies and families may exclude themselves from engagement with the Cadets where;

- they don't see themselves reflected within the make-up and activity of the Cadets;
- the 'uniformed' nature of the organisation acts as barrier based on their experiences with the Police, or
- they would need additional support to engage.

External – Cadets

Age – positive all

The National Volunteer Police Cadet programme of activity provides an additional opportunity within participating Force areas for young people aged 13 – 18 to gain new skills and participate in activity leading to personal growth, etc.

Overall their age profile is;

Age profile of cadets								
Age	12	13	14	15	16	17	18	Over 18
Number	2	14	34	26	32	14		

The NVPC has the stated aim of working with (at least) 25% of young people from a vulnerable background, based on the last census of cadets 22% of Devon and Cornwall Police met this criteria and the cadets will particularly have a positive impact for these young people;

- who are often left out of, excluded or don't engage with 'out of school' activities including social action
- by empowering and equipping them to increase confidence, self-esteem and skills to ensure they are supported to participate fully
- by enabling them to take control and shape their involvement with the NPVC

- by acknowledging and recognising their achievements, understanding their impact and contribution

Age – negative

As a consequence of the independence of individual units within Forces where there may be a negative impact for some children and young people where their geographic unit does not offer NVPC activity across the full age banding.

Recruitment methodology applied by individual cadet units could have a negative impact on Devon and Cornwall Police Cadets overall where the methods applied (e.g. word of mouth/peer/being asked directly) has the effect of merely recruiting (cloning) more of the same, rather than valuing, ensuring and actively seeking diversity.

The timing and location of cadet units may have a negative impact on young people at the younger end of the age branding who are more likely to be reliant on support in order to access the opportunities offered. The rurality of some of the force area may impact recruitment.

Mitigation: Better communication about the role of the cadets including where appropriate the personal experiences of young people involved. Signposting to partner/allied opportunities e.g. Duke of Edinburgh where individual units are not appropriate for the young person applying.

Disability – negative

Whilst the intent of Devon and Cornwall is for all cadet units to be fully accessible to children and young people with a disability, the perception of the cadets as being 'mini'- Police may prevent young people putting themselves forward because they do not see themselves mirrored either within individual cadets units or in the composition of host Forces. This perception may be compounded by the actual physical location and accessibility of the buildings utilised by individual cadet units.

The stigma and subsequent discrimination that is attached to some disabilities/medical conditions e.g. mental health may prevent some young people applying where background checks/vetting is a requirement.

Mitigation: Better communication of the role of the cadets and their inclusivity for young people with differing disabilities focussing on what young people can do and achieve. Social Action activity involving young people with disabilities, their families and community could be used to break down these perceptions.

Background checks are a decision Devn and Cornwall has made for safeguarding purposes to ensure the safety of the young people involved and the integrity of individual Forces. The outcome of a background check/vetting would only impact on a young person where they have been convicted of a specific offence.

Race – Further research required around ethnicity. The identification of the Cadets as a 'uniformed' organisation may act as barrier to engagement for some young people, their families and communities. This reluctance is based on the real and perceived experience of some BME young people with the Police.

Young people from Gypsy/Traveller communities and Asylum seeker/refugees may be reluctant to apply to join a cadet unit with a Force where background checks/vetting is required. This reluctance is based on the real experience individuals from communities have had with law enforcement agencies.

Mitigation: Better communication of the role of the cadets and their inclusivity.

Social Action activity involving BME, Gypsy/Traveller and Asylum seeker/refugee young people, their families and community could be used to break down these perceptions.

Background checks are a decision for individual Forces and undertaken for safeguarding purposes to ensure the safety of the young people involved and the integrity of individual Forces. The outcome of a background check/vetting would only impact on a young person where they have been convicted of a specific offence.

Religion and Belief – positive

The introduction and/or expansion of the social action programme of activity proposed by the NPVC supports the inclusivity of the cadets for children and young people from differing Faiths as the support of charitable work is a core tenet of most religious/belief systems.

Religion and Belief – negative

Some more formal types of social action are not familiar to or acceptable in the culture of some communities e.g. participating in opportunities with mixed faiths/cultures and/or genders for some orthodox communities.

The identification of the NPVC as a ‘uniformed’ organisation may act as barrier to engagement for some young people, their families and communities. This reluctance is based on the real and perceived experience of some young people from particular religious backgrounds with the Police.

Mitigation: Social Action activity undertaken in partnership with faith communities could be used to break down these perceptions for young people, their families and their community.

Sex – positive

The recent census of Devon and Cornwall Police (2015) indicates that there were;

Cadet numbers by Sex		
Female	Male	Unreported
104 (48.1%)	111 (51.4%)	1

The Devon and Cornwall Police Cadet activity has a positive impact on girls; with more girls engaged with the programme and experiencing policing opportunities than are Officers (50% more) or PCSOs (4%) working for Devon and Cornwall Police

	Devon and Cornwall Police Officers	Devon and Cornwall PCSOs
Female	30.4%	69.6%
Male	44.8%	55.2%

In addition, the Ipsos MORI survey 2014 identified that ‘Girls (46%) were more likely to participate in social action than boys (35%)’; the involvement of boys within the NVPC has a positive impact on their exposure to and learning from engagement in the social activity undertaken, which has the potential to positively impact on their later life chances.

Sex - negative

The use of background checks/vetting of young people applying to join the cadets may have a

negative impact on males who are more likely to have come into contact with the police particularly through their offending activity or are in danger of re-offending.

Mitigation: Background checks are a decision for individual Forces and are undertaken for safeguarding purposes to ensure the safety of the young people involved and the integrity of individual Forces. The outcome of a background check/vetting would only impact on a young person where they have been convicted of a specific offence.

5. Have you identified any potential interference or issues in relation to Human Rights?

Article 2: Right to Life	No	Article 3: Prohibition of torture	No	Article 4: Prohibition of slavery and forced labour	No
Article 5: Right to Liberty and Security	No	Article 6: Right to a fair trial	No	Article 7: No punishment without law	No
Article 8: Right to respect for private and family life	Yes	Article 9: Freedom of thought, conscience and religion	No	Article 10: Freedom of expression	No
Article 11: Freedom of assembly and association	No	Article 12: Right to marry	No	Article 14: Prohibition of discrimination	No
Article 1 or protocol 1: Protection of property	No	Article 2 of protocol 1: Right to education	No	Article 3 of protocol 1: Right to free elections	No

6. Where any potential interference has been identified at section 5 please answer sections a-d below:

Please note Articles 3,4,7, the first part of 9 as well as protocol 13 are absolute rights and cannot be justified. These must be mitigated within policy. The other Articles are qualified rights and must be justified within policy where mitigation is not possible.

a) What is the potential for interference with an individual's rights?	Article 8. Only when safeguarding is necessary, there may be a potential interference. Cf. ACL29 Information requested from young people looking to join the cadets is required in order to safeguard and ensure their safety whilst participating in activities. The proposals specifically require an initial screening to be undertaken by the police on application by the young person to join the cadets in order to ensure the safety of the young people involved in Devon and Cornwall Police cadets and the integrity of Devon and
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	Cornwall Police	
b) What is the legal basis?	<p>Supporting the obligations placed on the police service to protect the right to life and the right to be free from inhumane and degrading treatment by Articles 2 and 3 of the Human Rights Act. The Police have a positive duty to safeguard and ensure the safety of young people whilst in their care.</p> <p>DfE Working Together to Safeguard children (and as amended) 2015</p>	
c) Are the interferences necessary? What are the legitimate aims?	<p>Data recording when safeguarding children helps to inform and share information on children and young people coming into contact with the police who are at risk of harm. The information sought is required in order to safeguard and ensure the safety of young people joining the cadets and the integrity of individual Forces.</p>	
d) Are the interferences proportionate?	Yes. See c above.	
6. Proceed to full Equality Impact Assessment?	No	
7. Seen by Equality and Diversity Unit	<p>Name: Diversity Officer Date: 12/12/2016 Comments: Provided in blue above.</p> <p>If this was referred to EIA there would be further research required, however this absorption of E&D commentary and the overall PIA provides sufficient assessment for PIA.</p>	
8. Approved by Business Lead	<p>Name: Emma Webber Signature: Date: 14/08/17</p>	
<p>If progressing to full Equality Impact Assessment use the Equality and Diversity EIA template and start at step 2 (box 8). Both PIA and EIA together constitute a full EIA document.</p>		