



**Devon & Cornwall Police Equality Impact Assessment Template**

<b>Name of Project / Function / Policy / Strategy</b>	D51 Grading & Deployment Policy and D188 Incident Recording Policy
<b>Name of Assessor / Author</b>	[FOIA s.40(2)]
<b>Name of Project / Function Lead</b>	ACC Netherton
<b>Start Date</b>	23 August 2011
<b>End Date</b>	14 Oct 2011
<b>This EIA is being undertaken because it is:</b> Part of a project proposal submission <span style="float: right;">Yes</span> A result of organisational change <span style="float: right;">Yes</span> A review of an existing project / function / policy <span style="float: right;">Yes</span> Other (please state reason):	

If you are unsure about the answer to any of the questions below please contact Equality & Diversity Department [diversityhq@devonandcornwall.pnn.police.uk](mailto:diversityhq@devonandcornwall.pnn.police.uk) for further support.

**Step 1 Initial Screening**

Significance and Impact	
<b>Does the project affect employees, service users, partner organisations or the wider police service?</b>	Yes
<b>Is it a major project with a significant effect on how functions are delivered?</b>	Yes
<b>Does it involve a significant commitment of resources?</b>	Yes
<b>Does it relate to an area where there are known inequalities? (e.g. gender pay gap, hate crime, accessibility)</b>	Yes
If the answer to any of these questions is 'YES' then continue to complete a full impact assessment.	

Relevance
<b>Consider each of the aims of the general duties and explain which aspects of the project</b>

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### are relevant to which duties. (see Guidance for list of the Duties)

Version 3 of the Grading and Deployment Strategy had an Initial Screening carried out (attached as a separate document) which recommended a full EIA. As a result of consultation on improvement considerations Version 8 is the current published working practice, hence the EIA being revisited.

Deployment of Police resources based upon threat, risk, harm and vulnerability will help prevent our working practices from being discriminatory.

In not identifying the particular need of a protected group will put the Constabulary at risk from challenge. It is essential that we identify those needs in order that we are able to deploy a proportionate response.

Relations between the Constabulary and persons who share a relevant protected characteristic will be fostered if we deploy a consistent proportionate response according to need.

23/11/11, As a result of the recent HMIC Inspection into Crime and Incident recording a need has been identified in relation to the development and implementation of an Incident Recording Policy. Prior to November 2011 the issues relating to Incident Recording were captured in D51, as a result of the Inspection it has been acknowledged that the organisation should have a separate policy in relation to incident recording.

### Has the screening identified the project as having relevance to any of the following protected characteristics?

Age	Yes	Disability	Yes	Sexual Orientation	Yes
Race	Yes	Sex	Yes	Religion or Belief	Yes
Gender reassignment	Yes	Pregnancy & Maternity	Yes	Marriage or Civil Partnership Status	Yes

### Does the project have the potential to impact on an individual's rights as set out in the European Convention of Human Rights

Article 2 Right to life	Yes
Article 3 Prohibition of torture	Yes
Article 4 Prohibition of slavery and forced labour	No
Article 5 Right to liberty and security	Yes
Article 6 Right to a fair trial	Yes
Article 7 No punishment without law	Yes
Article 8 Right to respect for private and family life	Yes
Article 9 Freedom of thought, conscience and religion	Yes
Article 10 Freedom of expression	Yes
Article 11 Freedom of assembly	Yes
Article 12 Right to marry	No
Article 14 Prohibition of discrimination	Yes
Article 1 of *Protocol1 Protection of property	Yes

### Where it is considered that a project has no relevance to the general equality duties or equality groups, this should be recorded here with the reasons and advice.

N/A

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<b>Proceed to full EIA</b>	Yes
<b>Approved by Equality &amp; Diversity Department</b>	Date: 24 August 2011 Name: [Equality & Diversity Dept]
<b>Approved by Project Lead / SRO</b>	Date: 10 January 2012 Name: Craig Downham

**Step 2 Scoping of the Equality Impact Assessment**

<b>What are the main aims, purpose and outcomes of the project? What do you hope to achieve by it? Who will benefit?</b>
<p><b>Please provide details</b></p> <p>This document covers both the First Contact Resolution aims of the Grading and Deployment Strategy including the Incident Recording Policy and also access to the Solvability matrix.</p> <p>The overarching aim is to resolve the optimum number of requests for service at the first point of contact without the need to deploy unnecessary and inappropriate resources. Where this is not possible every effort should be made to resolve the request for service at the earliest most appropriate Contact Point.</p> <p>Application and implementation of the strategy will enable the Constabulary to deploy the most appropriate resource to the right place at the right time based on risk, threat, harm and vulnerability.</p> <p>This strategy will protect life and property, prevent and detect crime and keep the peace based on individual need.</p>
<b>What aspects of the project are particularly relevant to equality?</b>
<p><b>Please provide details</b></p> <p>Pre May 20 2011 Devon and Cornwall Police's Grading and Deployment Strategy was based on primarily crime type. Post May 20, the new Grading and Deployment Strategy provides that resources are deployed according to individual need and decisions are based on threat, risk, harm and vulnerability. This new process went live on 20 May 2011. A post implementation review 6 weeks into the new strategy, along with an HMIC inspection has shown some gaps in the process which could increase the risk to victims/callers/witnesses from protected groups. In particular children (121as), vulnerable adults, hate crime and domestic abuse. A series of papers were written to address the gaps in the processes and mitigate against the risks identified.</p> <p>Deployment of Police resources based upon threat, risk, harm and vulnerability will help prevent our working practices from being discriminatory. Individuals and communities who share a protected characteristic will have their individual need assessed based on their risk, harm, threat and vulnerability.</p> <p>. This approach is consistent with the Force's Public Sector Equality Duty to eliminate</p>

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harassment, victimisation and other unlawful discrimination. By identifying needs the Force is able to deploy a proportionate response.

Relations between the Constabulary and persons who share a relevant protected characteristic will be fostered if we deploy a consistent proportionate response.

Of particular concern will be Age, Disability and Learning Disability, Ethnicity and Gender & sexual orientation.

There are interdependencies with the Risk Harm & Vulnerability paper, solvability matrix and the ICT review.

Version 8 of the Draft Grading & Deployment Strategy refers dated 17/05/11 – this document is attached as an appendix.

**1 – An identified barrier to access was how the Force dealt with calls from people who have a Learning Disability, those who are Deaf/hard of hearing, and where English not their first language**

**Staff within the FCC are trained in the use of language line for calls where English is a barrier and both minicom and Talk Type where either speech or hearing is the barrier. Talk Type is similar to language line in that it is a three way conversation with the operator in the middle typing back to the caller.** Pre May 20 2011 Devon and Cornwall Police's Grading and Deployment Strategy was based on crime type. For callers who were deaf or hard of hearing minicom was the only available communication with CMCU along with **80999** being monitored by Hampshire Constabulary. From May 20 2011 this has not changed, however e-mail should soon be available on the **101** system. Pre May 20 2011 there was a low reporting by persons of all groups (disability) of disability related incidents. Unless the report could be attributed to a crime type then the risk, harm or vulnerability did not factor in the resourcing process. The deployment strategy has deploys according to individual need based on threat, risk, harm or vulnerability. Being subjective in nature it is extremely difficult to give exact advice and guidance to staff on the proportionate way of dealing with these incident types. This has been recognised and a Training Needs Analysis is going to be undertaken. In the mean time should staff have any doubt the default will be to create a log of at least **Prompt** grading.

23/11/11, a Training Needs Analysis has been conducted and all staff within CMCU are in the process of receiving a days uplift training in identifying vulnerability and a better understanding of the D51 Policy.

**2 – A difficulty highlighted (by PIR or HMIC) was how call handlers identified vulnerability over the phone? This will always be a challenge where disability, particularly learning disability is concerned as it is recognised that an individual's call to the Force does not necessarily make them vulnerable and requiring a prompt response but in the majority of cases it will be the circumstances that determine vulnerability.**

**To address this difficulty and mitigate against the risk, when a caller is reporting a crime which is being inputted at First point of contact they will be asked questions relating to any form of disability and if they feel intimidated or vulnerable. An Modus Operandi code is then used to identify this within the crime and these include age groups.**

**In circumstances where vulnerability is identified there will be a Police response of at least a Prompt grading in line with the Grading and Deployment Policy.**

23/11/1, The briefing paper put forward with both the Grading and Deployment Policy and the

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Incident Recording Policy have recommended that all incidents will be graded according to the level of Threat, Risk, Harm and/or Vulnerability and not has mandated Prompt response. This should be possible due to the role out of both NDM training and Vulnerability training to all staff within CMCU.

**By way of further mitigation, the bespoke National Decision Model training will provide staff the framework to use when taking calls and/or resourcing incidents and further work will be done to build on this, including a question bank within [text removed FOIA s.43(2)] which will be designed to assist in identifying Vulnerability. Discussion is taking place to deliver further bespoke NDM training to the control room including an NCALT E-Learning package. A one day uplift package is also being developed for the control room which is mentioned in the action plan section.**

23/11/11, as mentioned above this training is now being undertaken.

### **3 – In dispatching to ‘immediates’ how does the force comply with it’s duty of care to the officer attending (single crewed/double crewed), balanced against the duty of care considerations of the victim?**

Incidents involving violence/threat of violence are switched to the Control room Sgt and/or the FIM in order that they are risk assessed using the CMM (now being replaced with the NDM) in order that a proportionate Police response is dispatched with both officer and victim safety in mind. These assessments will cover issues of number of officers to attend and type of resource to attend, ie Taser, Firearms, dogs, use of Negotiators etc. There is also guidance in the Manual of Guidance on the Management, Command and Deployment of Armed Officers that the FIMs are trained in as Silver Firearms Commanders, which relates to Emergency Entry Tactics in certain situations.

All Police officers are trained in dynamic risk assessment and have a duty to risk assess each situation that they deal with. Control room staff will inform the unit/s attending of any pertinent information that will assist them in this process. Pre May 20 2011, immediately after and now, the criteria for the types of logs mandated to be sent to the Control Room Sgt and/or FIM TO establish threat or risk to staff has been covered by BQY 13 Chain of Command.

### **5 – What do we do with a ‘vulnerable caller’ reporting a routine incident?**

**[FOIA s.22]**

Crime where risk is identified which means that the crime cannot be recorded at the first point of contact should then be assessed in accordance with D51 and an appropriate grading determined. To remain in line with this ethos a briefing paper for both the D51 and Incident Recording Policy will recommend that the Force considers bringing DA and Hate crime incidents in line with the Threat, Risk, Harm and/or Vulnerability grading. The action of doing this may need to be deferred until all CMCU staff have received both their NDM and uplift training.

**6 – In not creating logs that do not require police attendance and we give a reference number, how do we cater for minicom users?** Pre 20 May 2011 an ois log would have been created and the caller given that reference number. For callers who were deaf or hard of hearing minicom was the only available communication with CMCU along with **80999** being monitored by Hampshire Constabulary. As of May 20 2011 this has did not immediately changed, however e-mail is now available on the **101** system. Callers are now given a

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reference number which consists of the time, date and terminal name. It is understood that we have hardware that would enable text communication and that we should consider purchasing the software.

23/11/11, In order to return to a position of NSIR compliance and at the heart of everything we do the default position of the Force will be that all calls for service that fit the NSIR definition are recorded as a log, including non-attendance. Only if the call taker is content that the call does not fit that criteria and they use the NDM in their decision making will a log not be created.

**7 – How do we recognise what constitutes ASB – Pilkington type cases often start with very low level ASB, we want to ensure we have a record of this [FOIA s.31(1)(a)].**

[FOIA s.40(1)]

**8 – Q/A of logs to dynamically monitor threat, risk, harm and vulnerability? [FOIA Closed S.31(1)(a)]**

**9 – Principles of resourcing – current position and interdependency with Solvability Matrix.**

Call Takers will try to use the First Contact Resolution as per the ethos statement. If not deemed suitable for FCR they will then follow the Grading and Deployment strategy and create a log and grade in accordingly.

Pre 20 May 2011 'solvability' was not assessed in predetermining the amount of resource made available. It was solely on crime/incident type. Post 20 May 2011 we have asked staff to consider threat, risk, harm and vulnerability in assessing calls. If during crime recording at first point of contact and the call taker establishes that the caller is 'vulnerable' a log is created of at least 'prompt' and a unit dispatched accordingly. Call takers have had a 2 week training course in application of the 'solvability matrix'. Currently we have resorted to minimum responses, primarily 'prompt' response for our more at risk calls – more towards crime type e.g. Domestic Abuse & Hate Crime.

**What evidence is already available that will help in the development of both the project and the EIA?**

Public Satisfaction Survey data will be used at the next review date.

Community Consultation data – 4/4/11 was used in developing this EIA and the Grading and Deployment Strategy.

PIR, HMIC, Control Room feedback have been used and the full PIR in Oct/Nov will be used.

**Do you require further information to gauge the probability and / or extent of any adverse impact on protected groups?**

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**Yes / No** If no, please go onto the next section.

If yes, please explain how you will fill any evidence gaps. Be specific – outline how you will collate evidence, the time frames and responsibilities for doing so.

### Which communities and groups will need to be consulted or involved in the development of the project?

Please indicate:

- The consultation that has taken place, with whom, when and how.
- Summary of the feedback.
- Link to any written record of the consultation so that it can be published alongside this assessment (if it is not provided your assessment will not be able to receive quality assurance sign off by the Equality & Diversity Department);
- How you will continue to gain stakeholder views once your policy has been implemented.

Following consultation and involvement it may be necessary to go back to the assessment and revise your findings.

A Community consultation exercise took place on the 4<sup>th</sup> April 2011 where a number of questions were answered and these results will be factored into the policy. A further consultation day will need to be held to establish if any of the fears raised on the initial day have become reality.

E-mails have been sent to the Police Federation, Unison, Occ Health, PSD and Staff Support Group's requesting examples of any information they have been given by their members, both positive and negative of the effects of the Strategy at this time.

An Inspector is attending the Joint Staff Support Group Meeting (Chairs and Vice Chairs) on the 24 November. Update, due to a low level of attendance the meeting was postponed. The updated D51 was therefore e-mailed to the chairs of all the support groups for any further feedback.

An appointment is being made to speak to Legal Services Department. 23/11/11 - Legal Services have been consulted and the EIA has been signed off on 14/10/11.

The policy will sit within CMCU and be reviewed in line with Force Policy or sooner if necessitated by information indicating a need to do so.

## Step 3 Equality Analysis

### Assessing the impact for different groups

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### Please provide details

When completing this section please set out the potential / actual impact of the project proposals for different groups with reference to each of the aims of the Equality Duty.

You should consider:

- What are the main findings from your involvement and consultation and do they demonstrate problems that need to be addressed? The main issues that were raised in a consultation event held on 4 April 2011 are predominantly covered in the assessment above. However, what needs to be particularly addressed are incidents/calls that involve Deaf/hard of hearing and Learning Disability.

With regard to the Deaf Community we were aware as an organisation about the gap that existed in communication – minicom, typetalk and the 80999 filled some of that gap. Texting has been asked for which involves a hardware/software review. The introduction of the 101 service will now enable callers with a smartphone to be able to e-mail us. This will now need to be marketed.

Learning Disability and the different levels of mental incapacity issues are extremely difficult to assess over the phone, if there is any doubt as to the caller's mental capacity then the Force will grade this at least a 'prompt' to ensure that a proportionate response is given. This falls in line with our Grading and Deployment Strategy.

- Could the project affect different groups disproportionately? Yes – however the review into the Grading and Deployment Strategy is designed to establish individual need at the earliest opportunity based on threat, risk, harm and vulnerability in order that the proportionate amount of resource can be dispatched. This may mean indifference in numbers or type of resource based on protected characteristics.
- Is there evidence of higher or lower participation, or uptake by different groups? In the consultation event on 4 April 2011 invitations went to both voluntary and statutory partners representing protected groups across Devon & Cornwall. Each work stream had geographical and protected characteristic representation and it is felt that the concerns raised are covered above. The new way of working will however be dynamically assessed – as evidenced in the ASB, CRU/MASH and Routine Log Resolution Papers.
- Could the project outcomes differ for different protected groups? Yes – Based on individual need on threat, risk, harm or vulnerability – different protected groups may receive more resource in order that an outcome to justice may be achieved. The introduction of the National Decision Model may influence this as well.
- If there will be a greater impact on one group, is that appropriate and consistent with the aims of the project? There should be a positive impact on callers who are deaf/hard of hearing as well as those who have a Learning Disability. This impact will focus on the barriers that people from these protected groups face – however in time this focus should reduce when access to our organisation will be more equitable.
- Could the project disadvantage people from one or more protected groups? Consider any unintended consequences or barriers that might prevent it being effective for certain groups. None known at this time – process is subject of a dynamic review.
- Is there any evidence that any part of the proposed project could discriminate unlawfully, directly or indirectly, against people from some protected groups? Not at this time – the review is planned to reduce the chances of this happening.

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- [FOIA s.22]

- Do the project proposals include lawful positive action or other methods to address particular needs that should be retained? Not at this time.
- Do the project proposals identify potential opportunities to promote equality and ensure equitable outcomes for different communities and groups? In order to ensure equitable outcomes the grading and deployment review is designed to establish individual need at the earliest opportunity based on threat, risk, harm and vulnerability in order that the proportionate amount of resource can be dispatched. This may mean indifference in numbers or type of resource based on protected characteristics.

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Learning Disability and the different levels of mental incapacity issues are extremely difficult to assess over the phone, if there is any doubt as to the caller's mental capacity then the Force will grade this at least a 'prompt' to ensure that a proportionate response is given. This falls in line with our Grading and Deployment Strategy.

- Is there an opportunity to promote positive attitudes to disabled people and good relations between different groups and communities? The earlier we can identify individual need we can make available the proportionate amount of resource so as to minimise the impact on all concerned. This in turn will help promote positive attitudes and good relations between different groups.

With regard to the Deaf Community we were aware as an organisation about the gap that existed in communication – minicom, typetalk and the 80999 filled some of that gap. Texting has been asked for which involves a hardware/software review. The introduction of the 101 service will now enable callers with a smartphone to be able to e-mail us. This will now need to be marketed.

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- Does the project have a bearing on participation in public life? If so, can participation of disabled people be promoted and are other groups under represented? The earlier we can identify individual need we can make available the proportionate amount of resource so as to minimise the impact on all concerned, the sooner we can address the underlying issues.

With regard to the Deaf Community we were aware as an organisation about the gap that existed in communication – minicom, typetalk and the 80999 filled some of that gap. Texting has been asked for which involves a hardware/software review. The introduction of the 101 service will now enable callers with a smartphone to be able to e-mail us. This will now need to be marketed.

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- Is the proposed project likely to affect relations between different communities or groups; for

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example because it is seen as favouring a particular group or denying opportunities to another? The earlier we can identify individual need we can make available the proportionate amount of resource so as to minimise the impact on all concerned. There may well be a difference in the number of resources assigned to similar incidents but this may be as a reasonable adjustment for the caller/victim/witness.

**What can you do to maximise opportunities to further promote equality and ensure equitable outcomes for different communities and groups?**

**Please provide details**

Marketing and engagement with protected groups around our grading and deployment strategy so that we can manage the expectations of our communities. This may well help underpin confidence in our ability to respond proportionately and demonstrate our fairness in allotting police resources.

**What is the outcome of the Equality Impact Assessment? (Choose ONE option) to be completed**

No major change – the EIA demonstrates that the project plan is robust. The evidence shows no potential for discrimination and opportunities to promote equality have been identified and implemented.	Yes / No
Adjust the project proposals / plan to remove barriers or to better promote equality.	N/A
Continue the project despite potential for adverse impact or missed opportunities to promote equality.	N/A
The EIA identified actual or potential unlawful discrimination.	N/A
Changes have been made to the project to remove any unlawful discrimination.	N/A
The proposals are deemed 'business critical'. Legal advice has been sought and objective justification for the proposals are attached.	N/A

**Action Plan – Details of proposed mitigation**

Action	Owner	Due Date	Outcome
1 Days uplift training is being planned for every member of Control room staff to assist in closing the knowledge gap in	[FOIA s.40(2)], BIRT	14/11/11	Greater understanding by staff within CMCU of Threat, Harm, Risk and/or Vulnerability. Corporate

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relation to both the Grading and Deployment strategy (D51) and also identifying vulnerability over the telephone.			understanding of the D51 Policy by staff.
[FOIA s.43(2)]	[FOIA s.40(2)], BIRT		[FOIA s.22].

**Step 4 Monitoring, Evaluation and Review**

Monitoring and Review	
<p><b>Please provide details of how the actual impact of the project will be monitored?</b></p> <p>These Policies will continue to be monitored and updated on a dynamic basis as per the previous papers that were submitted and issues were identified.</p> <p>Full blueprint PRI.</p> <p>Future HMIC Inspections.</p> <p>Feedback from Community Groups via the Equality and Diversity Team.</p>	
<p><b>When will this EIA be reviewed?</b> (If not within a year please provide reasons)</p>	<p>Date: Reviewed as necessary in line with any changes and at a period of three months.</p>

**Step 5 Approval and publication**

Approved by Equality & Diversity Department	Date: 24 August 2011 Name: [Equality & Diversity Dept]
Approved by Project Lead / SRO	Date: 10/1/12 Name: SUPT C P DOWNHAM

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## **Step 6 Monitoring and Reviewing the Action Plan**

<b>Review of EIA - Update / Observations / Changes</b>	
<b>Please provide details:</b> To be reviewed at a later date.	
<b>Approved by Equality &amp; Diversity Department</b>	Name: Date:
<b>Approved by Project Lead</b>	Name: Date:
<b>Date of Next Review</b> (If no further review required please provide reasons)	Date: