

Section 75 Progress Report 2002-2003

EQUALITY COMMISSION

FOR NORTHERN IRELAND

Public Authorities Progress Reports 2002 - 2003

Template for Public Authorities to report on Implementation of the equality and good relations duties under Section 75 of the NI Act 1998

The information required from public authorities will cover the period from 1 April 2002 to the 31 March 2003 and is to be submitted to the Commission by 31 July 2003, **electronically (by completing this template) and in writing, with a signed cover letter from the Chief Executive** or, in his/her absence, the Deputy Chief Executive.

This year's progress report builds upon the guidance provided for the past two years, for purposes of consistency and comparison. It also seeks some additional information on: the status of EQIAs planned and progressed, aspects of Section 75 consultation and the identified impact/outcomes of Section 75 implementation to date.

Please report on progress by entering information at the end of each section in the template below. Prompts are included under each Section to allow you to assess the extent to which progress has been made within each area. Please note that these prompts are neither prescriptive nor inclusive. It is important that the authority reports on what it views as being relevant in terms of progress being made on implementation of the statutory duties.

Name of public authority

(Enter details below)

OFFICE OF THE POLICE OMBUDSMAN

Equality Officer name and contact details

(Enter details below)

Mr Sam Pollock

Chief Executive

Office of the Police Ombudsman

New Cathedral Buildings

11 Church Street

Belfast

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Section 1: Preparation of Equality Scheme

(Applies only to organisations whose scheme was not approved by the Commission prior to 1 April 2002)

- Outline measures taken during the year to develop the authority's draft Equality Scheme, including consultation, and details of the authority's formal consideration of the draft Equality Scheme, before submission for final approval to the Commission.
- Highlight any other areas of the scheme implemented prior to approval of the scheme

Prompt:

Have affected groups, staff, service users and groups representing the nine Section 75 categories been consulted about the organisation's draft scheme.

(Enter text below)

The draft scheme was developed in January 2002 and circulated to 150+ consultees incorporating affected groups and service users as agreed by the working group.

Disability Action provided training on public consultation sessions.

Consultation on the draft scheme took place between January 2002 and March 2002.

Comments and suggestions from the public consultation sessions were taken into consideration before submission for final approval to the Commission on 23/05/02.

Training and communication to all staff was implemented prior to approval of the scheme. This has included General Awareness Training, Screening and Impact Assessment Training and Gender Awareness Training.

Section 2: Strategic Implementation of the Section 75 Equality Duties

- Outline evidence of progress made in developing equality and good relations objectives, performance indicators and targets and inclusion of these in corporate and annual operating plans. This may include performance information and targets for 2003-2004.
- Outline steps taken to work with other public authorities in progressing the duties.
- Outline any details of partnership work developed with the voluntary and/or community sector as a consequence of Section 75 work? Comment on whether these partnerships have proved beneficial?
- Indicate if S75 is a standard agenda item for Board and/or Senior Management Team on a quarterly basis.
- Provide details of steps to progress the Good Relations duty such as undertaking a good relations audit, developing a strategy or providing training.
- Outline any factors that enhance or impede the process of Strategic Implementation.

Prompt:

Have the Board and Senior Officers reviewed the authority's progress report?

Has responsibility for equality been agreed and designated within the authority?

Has a clearly defined organisational structure with resources for implementation of the duties and assessment of policies been established?

Are equality objectives built into the job descriptions and performance targets of relevant staff, and are these reflected on in the appraisal process?

Is the authority on course for completing its 5-year timetable for implementation of its scheme? If not which areas of implementation are proving most difficult?

(Enter text below)

In developing Equality Objectives, the following policies have been created and implemented:

Recruitment and Selection policies and procedures

Equal Opportunity Policy

Harassment/Grievance Policies

Training of all managers and supervisors in connection with the staff appraisal and performance scheme (NICS)

Staff Training and Development Policies and opportunities for staff in general but also in direct relation to preparation for Investors in People certification now in process and for an office wide Accredited Training Programme now approved.

Communication Policy

New Initiatives e.g. Childcare Scheme vouchers

Good relations - Social Group

Maternity/ Paternity Leave arrangements

There has also been evidence of increased awareness and impact within the community as indicated in the third Public Awareness survey (enclosed).

Steps taken to work with other public authorities have included a range of work undertaken, as indicated in the Annual Report (enclosed).

As a result of Section 75, partnership work has been developed with the voluntary and community sector. This has included specific partnership work with Citizens Advice Bureau on accessibility to the public, and extensive work with WAVE, a voluntary organisation for bereaved relatives.

Section 75 is a standard agenda item for Senior Management Team meetings on a quarterly basis, where Equality targets and performance are reviewed and as highlighted and referenced in our Annual Reports.

In relation to progressing the Good Relations duty, note information within Public Surveys carried out independently by Northern Ireland Statistics and Research Agency (NISRA). There were no factors in particular that enhanced or impeded the process of strategic implementation, however, the nature of the statutory duties heighten sensitivity on cross community issues.

Responsibility for equality has been agreed and designated within the Office. The organisation has established a working group with managers across the functions that take ownership of the development of the draft scheme within their Directorates and had primary responsibility in the screening of policies and will be facilitators in the impact assessment programme.

We are on target to complete the five-year timetable implemented, with the current priority being the impact assessment of core policies.

Section 3: Screening & Equality Impact Assessment (EQIA) Timetable

3a)

- If a Screening Report has **not yet been submitted** to the Commission please advise us on the current position with regard to producing this report and forwarding to the Commission.

3b)

- If a Screening Report and EQIA Timetable has **previously been submitted** to the Commission please provide an update (**using the matrices in Appendix A**) detailing
 -
 - those policies that were subject to Equality Impact Assessment during 2002-2003
 - the timetable for Equality Impact Assessments in 2003-4.
 - (If relevant) list any proposals for legislation for which an assessment for the implications for the Section 75 duties was undertaken.
 - Outline any other factors that enhance or impede the process of policy screening or EQIA.
 - Outline how the authority, following screening of new policies, informs consultees of the outcomes from such screening exercises.

Prompt:

Does the authority require each department/directorate to identify how its policies impact on equality of opportunity and can promote good relations?

Has the authority involved consultees in screening of new policies? If so, how?

Has the authority informed consultees of the outcomes from screening of new policies? If so, how?

(Enter text below)

Our screening report has been submitted to the Commission in November 2002.

In relation to the EQIA Timetable, which was submitted to the Commission, please see appendix A for further details of those Equality Impact Assessments scheduled for analysis in 2003-2004.

As part of the screening process the Office of the Police Ombudsman has requested that each department/directorate identify how its policies impact on equality of opportunity and can promote good relations.

The Office of the Police Ombudsman has involved consultees in the screening of new policies by circulating a screening report and holding consultation meetings with representatives of the nine groups.

Section 4: Training and Communication

- Indicate if your organisation has developed a 5-year Training Plan (the Commission may wish to discuss details with individual bodies).
- Outline details of staff and Management Board/Committee training provision associated with the Section 75 duties/Equality Scheme requirements. Provide details of types of training provision (e.g. general awareness raising, specialist training on EQIA, Screening, Consultation) and whom this training was provided for.
- Provide details of how affected groups have been involved in the development and/or delivery of training.
- Provide a summary of any training evaluations and comments on the benefits of such training.
- Provide details of internal and external communication of the authority's commitment to the statutory duties.
- Outline any factors that enhance or impede the process of communication and training.

Prompt:

Does the authority monitor attainment of the training objectives contained within its equality scheme?

Has section 75 training involved input from representatives of the 9 groups? If so please state how this happened and if it proved useful?

Has section 75 training been evaluated? If so how has this happened and what are the lessons learned?

Do the Board and/or Senior Officers promote the authority's equality objectives in public statements, interviews and external events such as conferences?

(Enter text below)

The Office of the Police Ombudsman has developed a provisional 5-year Training Plan. To date, a range of Section 75 training has been delivered to staff and manager within the Office. General Awareness Training (provided to all staff), Equality Impact Assessment and Screening Training (provided to the Equality Scheme Working Group) and Consultation Training (for the Working Group) have all been provided.

Disability Action delivered the training on consultation to our Equality Scheme Working Group. Training evaluations revealed that staff within the Office found the training very useful and described it as being beneficial in raising their awareness of effective communication with consultees.

The Office of the Police Ombudsman has communicated its commitment to the statutory duties both internally and externally by circulating the Equality Scheme to all staff within the Office and also externally to all groups on our consultation list.

The process of communication within the Office is enhanced by our Communication policy and also through JNCC and team meetings, where staff are updated on Section 75 developments and training issues.

Section 5: Data Collection & Analysis

- Describe systems that have been established to supplement your available statistical and qualitative research including consideration given to using internal organisational data and external networks.
- Describe systems established to monitor the future adverse impact of policies that have been equality impact assessed
- Outline any factors that enhance or impede the process of data collection and analysis

Prompt:

Are the results of awareness or satisfaction surveys used to inform the development and review of policies?

Is relevant external data (for example Census, workforce profiles, customer surveys, focus groups) used to inform policy development?

Have new information systems been linked to arrangements for screening policies?

Internal monthly reports on demographic data on all complainants and external survey work carried out by NISRA, and most recently, independent research on young people are used within the Office to supplement available statistical and qualitative research.

Both general statistical and research reports act as systems to monitor the future adverse impact of policies, alongside focused analysis on the nine specified groups.

Enclosed sample copies of our trends and analysis of demographic factors of complainants (members of the public) who consider it necessary to use this Office.

Section 6: Information Provision and Access to Services

- Outline what action has been taken to review and develop arrangements for the provision of information in accessible formats.
- Detail steps taken to make affected groups aware of information disseminated by the authority and the services it provides.
- Describe any arrangements to develop monitoring systems regarding access to information and services to ensure equality of opportunity.
- Outline any factors that enhance or impede the process of information provision and ensuring/improving access to services.

Prompt:

Are alternative formats provided where appropriate to enable people from across the nine Section 75 categories to have access to all services?

Have appropriate consultation mechanisms been developed and used to establish needs /satisfaction levels?

Does the authority monitor uptake of services as a standard procedure?

(Enter text below)

Alternative arrangements have been provided to make the provision of information more accessible to affected groups. This has involved making information available in large print, Plain English, in Braille, on audio cassette and in Irish, Ulster Scots and Chinese and available on our Internet Site.

The Office has taken various steps to make affected groups aware of information regarding Section 75 issues and also information concerning the services that we provide. This has been supported by circulation of the Equality Scheme, Screening Report, Public Awareness Surveys and also through presentations to various groups across the province.

All contact data from within the Office, whether by visit, call, email or website access is monitored and reviewed six monthly and annually, see Annual Report and the monthly and quarterly reports referred to in the last section. See also our Baton Report, recently published, indicating community background factors.

We have found that publishing reports/ information on our website, and ensuring that documents are readily available in various formats/languages has proved effective in enhancing the process of information provision.

In addition, we also ensure that documentation from our Office is available throughout PSNI and CAB centres, thus enhancing our communication and information provision service further.

Section 7: Complaints

- Identify the number of Section 75 complaints received during the year.
- Identify the number of Section 75 complaints resolved during the year.
- Identify the number of ongoing Section 75 complaints.

Prompt:

Does the authority have in place a Section 75 complaints procedure?

Does the authority monitor Section 75 complaints and the issues arising?

Have complaints led to policy changes or an undertaking of an Equality Impact Assessment of a policy relating to a complaint?

(Enter text below)

The Office has in place a complaints policy and procedure in place and the nature of the complaint is identified. All complaints from the police and the public are registered and must be responded to within the procedure set down. In almost 3 years we have had 5 complaints in relation to matters of discrimination or unfair treatment. applications to the industrial tribunal. Two are outstanding and all others have been withdrawn or judgements and decisions given in favour of the Office.

Section 8: Timetable

- Provide an update on your equality scheme implementation timetable, identifying any changes since your previous report.

Prompt:

Is the implementation timetable reviewed on a regular basis by the Board and Senior Officers?

(Enter text below)

Please see attachment.

Section 9: Consultation

Provide details of organisational arrangements for managing section 75 consultation exercises and processes e.g. system, processes, methods, communication channels.

Prompt:

Describe the system put in place by the authority to plan and manage consultation exercises?

What are the main consultation methods which you have used?

Have consultation exercises involved consulting on equality/good relations in conjunction with other policy development/review areas e.g. best value, good practice reviews?

Has the authority used communication channels of umbrella groups or representative groups?

If so please give examples and comment on usefulness of using such mechanisms.

Have consultation exercises been joined-up, in relation to consulting on similar policies at the same time or in relation to joint-consultation exercises with other public authorities?

(Enter text below)

See Draft Equality Scheme and Screening Reports.

Section 10: Impacts and outcomes

Please provide relevant information about impact of implementation of Section 75 to end of 2003. This should include details of existing policies changed to better deliver equality of opportunity; equality proofing of new policies; information about impact of new policy (better

service provision, alternative service provision, accessibility to services, information gathering on users/non-users of services, satisfaction survey information); information on improved policy/services for nine groups.

Prompt:

How is policy formulation being managed to take account of the need to mainstream Section 75 duties?

Are all new or revised policies equality proofed by the authority? If so what process is used?

How have policies subject to EQIA changed as a consequence of the process?

Is there any evidence of how newly formulated policies or existing policies changed as a result of impact assessment are better delivering equality and/or good relations?

Has Equality Impact Assessment led to better policy making and service delivery? Please provide specific examples. These should indicate which Section 75 groups have benefited from policy changes, and how.

What, at this stage, do you perceive to be the main outcomes from implementation of the statutory duties?

(Enter text below)

Mainstreaming of Section 75 duties on this Office are in three different contexts: the context of the public, where individuals believe they have experienced unfair or inadequate policing service and wish to make a complaint; police officers who may consider that the complaints system may have been unfair to them, either generally or specifically; our staff who should be employed and managed fairly and equitably. As a newly constituted Office we have been able to assess and review the making of new policies and procedures in line with the guide to the statutory duties set out in Section 75. Because of an extensive ability to record, collate, report and research on the activity surrounding complainants, police officers and our staff, we are able to assess the impact of our policies, particularly in relation with persons with different religious belief, age, marital status and gender. We can see that much more can be done in relation to assessing impact in relation to disability and to persons with dependents and racial groupings. As with many public sector organisations it will require focused effort for us to develop effective assessment mechanisms for political opinion and sexual orientation because of the conflicting advice received from consultees.

Section 11: Additional Information

- Report information on any other matters considered relevant to the authority's implementation of the Section 75 duties.
- Please include a general statement on whether the implementation of the duties is leading to improvement in how the authority undertakes its work?

(Enter text below)

We have an effective equality working group spearheading the work necessary in compliance with Section 75. The priorities set for year 2, 3 and 4 are manageable and achievable.

The focus for year 2 centres on public awareness and performance in relation to the recruitment and selection of employees. While the general indicators in these areas are positive and satisfactory, it is necessary to analyse more specifically the impact across the nine specified groups insofar as it is possible to do this.

In year 3 the focus must be more specific on the level of impact that can be assessed in the outcomes of investigations, in other words, not just the awareness of the system provided, but the effectiveness of the system. This relates also to the effectiveness of the Informal Resolution processes where the potential for individuals being treated in a variable manner is even more significant.

In year 4 attention must be given to procurement and security assessment. Currently we operate in line with the principles and guidance set out by the Northern Ireland Office, the Northern Ireland Civil Service and Government Procurement Office in relation to these mainstream processes. However, the Office must assess the extent to which the impact of policies and procedures adopted by the Northern Ireland Office may be acting positively or negatively on this organisation.

Lastly in year 5 we must review the overall impact of the policies and practice in policing in Northern Ireland and the extent to which they have been supported in terms of fairness and equality by the operation and impact of this Office.

The primary mechanisms available to our working group will be the ongoing statistical and research tools, the availability of external research resources as these exist at present. However, the working group will have to make use of specific survey work and focus group techniques in order to test a particular impact or to identify deficiencies in relation to some of the groups referred to. Resources have been set aside through the Research Branch and also a significant element of training budget is dedicated to continuing equality awareness training and impact assessment.

Appendix A

EQIA Timetables

Matrices

Please enter details relating to the authority's Equality Impact Assessment timetable and progress on it.

EQIA Timetable Reporting Matrices – period to end March 2003 Existing policies – included in initial EQIA timetable

Title of existing policy EQIA's due to be completed pre-March 2003	Stage (as per Steps 1-7 of EQIA Process)	If joint-EQIA please state partner authorities	If EQIA completed is amended policy now being implemented? Y/N	If EQIA completed is amended were adjustments to policy a result of <u>A</u>ssessment of adverse impact/ feedback from <u>C</u>onsultation, or <u>B</u>oth <i>Please enter A, C or Both</i>
1.				
2.				
3.				
4.				
5.				

New policies, i.e. new or revised policies developed after initial EQIA time-table produced

Title of new policy EQIA's due to be completed pre-March 2003	Stage reached (as per Steps 1-7 of EQIA Process)	If joint-EQIA please state partner authorities	If EQIA completed is amended policy now being implemented? Please enter Y/N	If EQIA completed is amended were adjustments to policy a result of <u>A</u>ssessment of adverse impact/ feedback from <u>C</u>onsultation, or <u>B</u>oth <i>Please enter A, C or Both</i>

1.				
2.				
3.				
4.				
5.				

EQIA time-table for 2003-4

Title of EQIA's due to be commenced during April 2003 – March 2004	Existing or New policy? Please enter E or N below.	If joint-EQIA please state partner authorities	Expected completion date of EQIA
1.Public Awareness	Existing		
2.Recruitment and Selection	Existing		
3.			
4.			
5.			

OFFICE OF THE POLICE OMBUDSMAN SECTION 75 TIMETABLE

The following timetable summarises the measures which the Office proposes to take during the five years following the commencement of the Scheme.

Year 1 June 2002 – May 2003

Screening of policies (Stage 1) (June 2002 – August 2002)
Consultation on the screening exercise (Stage 2) (September 2002 – October 2002)
Report on the screening exercise (Stage 3) (November 2002)
Refining of methodology for carrying out equality impact assessments.
Equality impact assessments of those policies which have come first in the prioritisation exercise. (A prioritised schedule will be prepared for the 5-year period).
Review of monitoring arrangements.
Implement ongoing training plan as detailed in Section 9.
Complete first annual review and submit to the Equality Commission.
Screen and where necessary carry out equality impact assessments on all new policies, functions and duties.

Year 2 June 2003 – May 2004

Equality impact assessment of those policies identified for year 2 in the prioritisation schedule:

- Public Awareness- To ensure maximum awareness of the Complaints Service and that it is fully accessible and responsive to the community.
- Recruitment and Selection (including Advertising and Promotions and temporary/casual employees)

Finalisation of any ongoing specialist staff training.
Complete second annual review and submit to the Equality Commission.
Screen and where necessary carry out equality impact assessments on all new policies, functions and duties.

Year 3 June 2004 – May 2005

Equality impact assessment of those policies identified for year 3 in the prioritisation schedule:

- Guidance for updating Complaints and Police Officers
- Informal Resolution of Complaints

Complete third annual review and submit to the Equality Commission.
Screen and where necessary carry out equality impact assessments on all new policies, functions and duties.
Provide training for all new staff.

Year 4 June 2005 – May 2006

Equality impact assessment of those policies identified for year 4 in the prioritisation schedule:

- Procurement policy and purchasing arrangements
- Security Vetting- To ensure that adequate measures, processes and procedures are in place so that information and other assets are given appropriate levels of protection to enable OPONI to meet its legal and moral obligations and maintain confidence in the exercise of its statutory functions.

Complete fourth annual review and submit to the Equality Commission.
Screen and where necessary carry out equality impact assessments on all new policies, functions and duties.
Provide training for all new staff.

Year 5 June 2006 – May 2007

Equality impact assessment of those policies identified for year 5 in the prioritisation schedule:

- Improve Policy and Practice of Policing

Conduct a comprehensive review of the working of the Office's Equality Scheme over the five years.
Screen and where necessary carry out equality impact assessments on all new policies, functions and duties.
Provide training for all new staff.