

EQUALITY STANDARD FOR THE POLICE SERVICE

OVERALL GUIDANCE

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Overview

The Equality Standard for the Police Service (ESPS) is a performance improvement tool. Trying to make it cover every aspect of equality activity in policing would lead to duplication and unnecessary bureaucracy so, instead, it focuses on particular areas of concern where there have been difficulties in the past. It then requires evidence of delivery. In its contribution to improving core business delivery, the Standard will involve every business area in a force.

2. It has been developed to be flexible enough to allow for new legislation and policing initiatives without needing wholesale revision. Set at a strategic level with links to national policing priorities, it requires a basis of compliance to be in place—from the whole range of equality legislation and the Human Rights Act through to the Data Protection Act etc. This is a strategic tool so there is no requirement for the whole workforce to be familiar with the wording of each detailed criterion at time of implementation as the requirements should be met by people's day to day activity in delivering their tasks.

3. Its 3 main sections are Community and Customer Focus, Crime Impacts Focus and Organisational Focus. These match closely with current strategic objectives and also with planning for the 2010-11 workforce inspection. Knowing the customer, engaging the customer in improving service design and delivery, and increasing community confidence are key themes of the Standard and it looks at both external and internal communities.

4. It isn't a 'how to' document as it must be flexible enough to allow for different policing conditions and policing priorities. After implementation and as performance improves, an Editorial Board of NPIA and representative forces will be responsible for updates and ensuring that it remains challenging and sustains improvement.

Familiarisation with the criteria will be built over time and there has been no expectation in the development of the Standard that forces will set up a 'training course'. Formal 'training' might trigger resistance to what then looks like extra work, as opposed to the Standard offering a new way of capturing work that is already going on.

5. The Standard is evidence-based and requires real evidence of activity and outcomes against the stated criteria, not opinions of performance. In keeping with other equality standards, it has 3 stages. The first stage of Baseline must be met for HMIC's 2010-11 inspection.

6. As this is the first policing-oriented standard, it needs to set that baseline. It was recognised early on in the project that an emphasis on outcomes at too early a stage of adoption posed some risk to audit trails of activity. So, rather than go straight to fully outcome-based criteria, the second stage of 'Developing' checks the integration of appropriate activity to get desired outcomes. The third stage, 'Good Practice', then looks fully at outcomes. The last stage emphasises replicating 'what works', thereby getting best value from resources.

7. Activity to be evidenced for the 'Baseline' stage should already be taking place and potential documents to be cited as evidence include local and strategic policing plans, impact assessments, evaluations of deployments and investigations, minutes of meetings with communities, records of partnership activities and Annual Reports.

8. Occasionally, evidence may need to be collated and anonymised from personal files (for example, to evidence that the organisation is effectively integrating people back into the workplace). This would be one of the rare occasions when free text would be required as a named and accountable person could provide a non-confidential 'collating paragraph' showing that they had scrutinised all the available but confidential evidence. No evidence submitted for the Standard should contravene the Data Protection Act and forces should continue to make their own decisions about Freedom of Information matters.

Terms in use in the Standard

9. A Glossary has been provided but some terms below are key to effective use of the Standard. 'Equality' refers to the outcome of treating everyone fairly, with dignity and respect.

10. 'Diversity' is used to encompass differences within people throughout all policing business. Sensitivity and respect are required for engaging with anyone, whether outside the organisation or inside it. Factors in differences include those of culture, lifestyle and socio-economic status. Note that Police Authorities are required by law to look more widely at diversity factors than equality legislation usually does. By definition, all communities are 'diverse' but the word has been inserted from time to time in the Standard as a reminder that the widest viewpoint must be taken.

11. The Standard tries to avoid terms that have only partial meaning eg 'staff' (which could be read to exclude warranted officers, temporary contractors and un-paid volunteers). It therefore tends towards an inclusive term of 'workforce' or refers directly to those who work in a particular area or undertake a specific role.

12. 'Organisation' is also used to ensure that everyone working to deliver effective policing, whether police officer, police staff, contractor or volunteer is included. While all those in the organisation are the 'workforce', 'organisation' goes further to include more intangible areas such as policies and the approach used for developing skills.

13. 'Communities' may be geographical and/or virtual. They may be composed of individuals who appear to share similar needs arising out of factors currently set out in equality legislation. Section 1.1 of the Standard emphasises the two dimensions of community delivery by using its heading terms 'community' and 'customer' to look at both internal and external communities. Evidence is required not just in relation to the external community but also to corporate areas and their internal customer community.

14. The Standard acknowledges 'individuals', as not everyone feels as if they are part of a recognisable 'community'. For this reason the word 'group' is used sparingly to avoid any suggestion of arbitrarily pigeonholing individuals into groups or communities.

Cumulative approach

15. Forces will be required to have met the Baseline stage for the workforce inspection to be undertaken in 2010-11 by Her Majesty's Inspectorate of Constabulary (HMIC).

16. In the same timescale, forces are free to log evidence against any Developing or Good Practice criterion to inform their assessment of current performance - the Standard has been designed to help forces assess, and reflect on, current performance and to formulate action plans to gain improvements. Some forces will have already moved to Developing or Good Practice in aspects of their delivery.

17. The cumulative requirement means that a force may not put itself forward for overall assessment at Developing based purely on a previous year's attainment of Baseline. In other words, achievement of last year's Baseline does not stand as if set in stone as local policing priorities and delivery achievements always change from year to year. This is not 'equality by numbers'. Assessment at the third stage of Good Practice must therefore be based upon meeting both Baseline and Developing in the same timescale.

Criteria to be evidenced

18. Each criterion is couched so that different forces, with different policing conditions and priorities, will have a range of evidence to offer. Forces will still be able to benchmark with each other by comparing their quality and spread of evidence.

19. For the majority of criteria sets there is an obvious flow in the required evidence running from Baseline through to Good Practice. In some cases the 3 stages pinpoint specific aspects to test and there is no obvious and direct flow.

Evidence gathering and dealing with 'gaps'

20. Where measurement and analysis is referred to in the Standard, forces are likely to have it in place because of previous legislative and policing requirements. The Standard has an objective of helping to embed evaluation into policing culture.

21. The guidance provides lists of potential sources for finding evidence to cite but they are not exhaustive. There is a need to look much more widely for evidence than in the past when dealing with the fixed legislative duties. The IT Evidence Capture System will help forces to ensure that, as a minimum, they include the full range of those protected by legislation (often referred to as diversity 'strands').

22. Where little or no suitable evidence already exists to show that the force meets a particular criterion, then simple gap analysis should follow. Any decisions on how to bridge that gap should result in an audit trail leading to a local and/or strategic action plan that could be produced at a verification stage. Required actions will need to be prioritised in order to meet the Standard in time for HMIC's inspection timetable in 2010.

Quantity of evidence

23. Users of the IT evidence capture system will be able to 'flag' the quality or completeness of evidence they log. This will help to control the amount and quality of the final evidence submitted. The designated Administrator, with extra access rights to the IT system, will have the final say on what goes forward as evidence. That person is able to carry out regular reviews of the evidence already logged for each of the criteria.

24. The aim is to offer up what best evidences each criterion and not cite absolutely everything of peripheral relevance, as those who assess for the verification stages would quickly become overwhelmed. Of course, a force could set up its own preliminary collection and weeding of evidence before entering it on the IT Evidence Capture System. The IT system provided by NPIA will not be mandatory at implementation but it best supports benchmarking and sharing good practice.

25. There will be occasions where forces have previous evidence already in existence for a particular criterion – eg an activity from a previous year which still has some on-going element or outcome. If it can be justified as relevant and still providing outcomes then it can be used.

Quality and spread of evidence

26. Evidence must meet the full wording of the criterion. For example, criterion 1.1.1B refers to both profiling communities and having knowledge of their experiences so both must be in the evidence cited. Profiling is already a Neighbourhood Policing/Citizen Focus tool but it lacks a full equality and diversity focus unless it includes further knowledge of the people.

27. Evidence must not continually refer to the same few or very similar areas of diversity. Wide-ranging evidence from across as many areas of diversity as possible is

required – for example, it would not be acceptable to the verification process to provide most of the evidence related to race, gender and children/young people. The IT Evidence Capture System enables the Administrator to analyse the various areas covered by evidence currently on the system.

28. Pieces of evidence come in all sizes, shapes and depth of coverage. Some may be small and locally-based but with a really significant impact and outcome within a particular business area or small geographic area. Others may have much wider coverage right across the force but less depth of influence on people and outcomes. Each type is useful as evidence but it would not be acceptable to the verification process to have all the evidence offered against a criterion to be of the same type. There needs to be a 'mix and match' approach to get effective evidencing.

DPA and FoI considerations

29. Data Protection Act compliance must be retained at all times. Where any concerns about confidentiality are raised then the 'collating paragraph' approach can be used. However, this must always be done by a named and suitably accountable person in the business area from which the evidence comes.

30. It remains a local responsibility to consider Freedom of Information Act issues. Attention to this aspect must be given when considering evidence to be cited as the Standard will be subject to fully transparent verification processes.

*Equality Standard for the Police Service
Project Team*