

# Warwickshire PCC Equality Strategy 2024-2028

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## 1. Introduction

The Police and Crime Commissioner has been elected by the people of Warwickshire to carry out his statutory functions on behalf of each of them. As a public sector organisation, the Office of the Police and Crime Commissioner (OPCC) has a legal obligation to consider all individuals when carrying out our day-to-day work, in shaping policy and delivering services. We will ensure we are meeting this requirement and the requirements detailed in the Equality Act 2010, when carrying out activities and the preparations to do so. This strategy sets out the approach we will take to meeting our legal requirements.

## 2. Context

The Equality Act 2010 protects people from discrimination in the workplace and in wider society. On 5 April 2011, the public sector equality duty came into force. This requires public sector bodies to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The equality duty covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality), religion or belief (this includes lack of belief), sex and sexual orientation. It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination. The Equality Duty is designed to reduce bureaucracy while ensuring public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all.

The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

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Under the requirements of the duty the OPCC, as an organisation with fewer than 150 employees is expected to:

1. Publish one or more equality objectives at least every 4 years
2. Publish information on general duty compliance with regard to people affected by policies and practices every year.

### 3. The PCC's Equality Objectives

The PCC is committed to upholding equality as prescribed under the duty and further to it. The PCC has committed to the following:

- Demonstrating personal commitment to upholding equality in all areas of operation, both internally and when engaging with partners.
- Holding the Chief Constable of Warwickshire Police to account on equality issues within Warwickshire Police, both internally and when engaging with the public.
- Engaging with Warwickshire's diverse communities to ensure their concerns and needs are being heard and reflected.
- Ensuring the work of the OPCC is inclusive and individuals are able to access services in accordance with their needs.
- Seeking a diverse workforce which represents the communities the PCC and Warwickshire Police serve and to capitalise on knowledge and abilities required to deliver objectives.

### 4. Delivering the objectives

#### 4.1 Upholding Equality

The PCC has signed a Code of Conduct, which outlines how he will behave when carrying out his role, committing him to behaving in accordance with the Nolan Principles at all times. The Nolan Principles of Public Life are seven principles that guide the ethical conduct of public servants. The principles are: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership. They aim to foster an ethical culture and legitimacy in public services. The Nolan Principles are a guiding light for how to approach activities, and help ensuring transparency and equality for all.

The Deputy PCC (when in post) and all OPCC staff also sign a Code of Conduct.

The PCC is directly able to influence the public sector equality duty as an office holder, as well as through the activities of the OPCC in his name. When developing policies or programmes of activity the OPCC will ensure that equality matters are considered and that all individuals needs and interests are appropriately reflected. Noting that the Equality Act 2010 applies to protected characteristics of individuals, rather than

groups, it is incumbent on all decision makers to consider or engage with affected individuals when developing plans.

The PCC is person of standing in the community and can be a voice to influence positively. Through the delivery of a communications strategy the PCC should consider when to use this voice to foster good relations between communities.

## 4.2 Holding the Chief Constable to Account on equality issues

The PCC will hold the Chief Constable to account for the exercise of all duties relating to equality, diversity and inclusion. This includes monitoring all force activity with providers, organisations and their workforce to comply with the Equality Act and any further terms and conditions related to equality and diversity. The objectives, which are summarised below:

- Seek evidence to ensure appropriate protocols and policies are in place, that embrace diversity, providing fair and responsive services.
- Monitoring of the workforce, ensuring evidence to strive that it is representative of the communities served, provide an inclusive working environment and ensure all staff have similar opportunities to develop their potential.
- The PCC will continually review efforts through targeted intelligence gathering and analysis with the Chief Constable to promote a culture of continuous improvement to deliver better services to our communities and the workforce.
- Ensure the Chief Constable has a coherent vision of equality that sits within the wider business framework and is shared and owned by the force leaders, and wider workforce.

## 4.3 Engaging with diverse communities

## 4.4 Ensuring funded services meet the needs of communities

## 4.5 Ensuring inclusive access to services

Individuals have contact with the OPCC in a variety of ways and for a variety of reasons. Members of the public make contact with the OPCC by telephone, in writing or most often by email. They also access information about the OPCC through the website and other social media channels. In addition to this many professionals also use the same approaches to find out about or interact with our activities, either to deliver statutory objectives or to work in partnership with us.

Although a small organisation, the breadth of activity that we carry out is far reaching, and it is incumbent on us to ensure that individuals can access the information they require, however technical it is, without difficulty. Our website and other communication channels are developed alongside an approach to communications that is committed to the use of plain English; and clear explanations. The layout of the

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website is continually under review to ensure that relevant information is most easily accessible, and the information that we must legally publish is available and up to date. This means that people do not need to trouble us to access routine information. It is important that we therefore organise information appropriately and remove out of date information.

We must also ensure that our website meets accessibility requirements, and that we make improvements based on audit activity. We must ensure that the website can be accessed for those with visual difficulties and that the website is interoperable with assistive technology. We must also consider how the website or information contained within, can be translated into other languages, use BSL or visual communication supports.

In respect of email or telephone communications many of the same requirements exist. We expect a high standard of customer service and train staff to be able to communicate effectively, anticipating the needs of the individual where possible. We receive a high volume of correspondence that needs to be redirected to the force or for which a standard response is given out, and for these templates have been drafted to present information clearly and concisely.

The next most common type of contact is when an individual wants to express dissatisfaction with an activity of the police, and wishes to draw it to our attention. In these cases it is important to listen carefully to individuals to understand the information they are providing. Staff must consider communication needs in respect of contact from individuals and seek to understand the points they are raising even if it is not immediately obvious. Some individuals are unable to communicate in writing, even with the use of assistive technologies or require specific accommodations (such as coloured paper or specific spacing or font sizes), and staff are expected to reasonably assist individuals in engaging with processes. This may include offering to take the information in a different format, or arranging a video call or even a meeting with an individual.

We also have a role in respect of physical access to the police stations and buildings in Warwickshire, as the PCC is the owner of the policing estate and the Justice Centres. We are committed to ensuring that our buildings are accessible by all and provide disability access for visitors to public facing offices and police stations. When undertaking refurbishment works to our premises we review the access to, from and around our buildings to ensure continued compliance with this.

## 4.6 Seeking a diverse workforce

### Recruitment

We want our organisation to be both diverse and inclusive and to represent the communities who we work with and for, and we want to benefit from the best of the talent who can bring something to our organisation's mission and purpose. With that in mind we ensure that our recruitment activity is far reaching and inclusive, and we:

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- share recruitment opportunities far and wide through different media and social media channels
- publish our policies and procedures on the website so individuals can understand what it is like to work here and how we fulfil our obligations (such as maternity entitlements or flexible working)
- state clearly on our job advertisements that we support individuals to apply, even if they are not sure they meet all criteria for a given role, knowing that females are less likely to apply for a role than males if they don't meet all the criteria.
- offer a guaranteed interview to those with a declared disability who meet the essential criteria
- offer work experience to help individuals understand what we do

## Employees

Once employed we want all employees to be able to do their best work and will endeavour to create an environment in which each employee is able to contribute meaningfully and reach their potential. We will:

- Ensure the physical office is fit for purpose and all staff have access to the tools and equipment needed to do their job.
- Create agile working policies and maintain flexi-time to ensure that people are able to balance their work with their home life.
- Be transparent with policies and procedures so people know what they are entitled to and how to access it, or request it, and so that individuals can navigate difficult times with an understanding of the process.
- Publish information on where to get support (such as from the employee assistance programme), or other sources of help.
- Encourage staff to engage with force staff networks, many of which support protected characteristics.
- Ensure that we are clear about how to support colleagues with disabilities, and work with individuals to co-develop plans to meet individual requirements and make reasonable adjustments.
- Ensure that we accommodate religious requirements and are sensitive to specific needs at appropriate times in the year. Ensuring individuals are able to take annual leave in line with religious observance, where possible.

## Volunteers

The OPCC operates volunteer schemes, whereby training and supporting to volunteers is paramount. To develop an in-depth understanding for volunteers of the needs of communities within Warwickshire and capture the voices of the individuals who volunteers come into contact with. Volunteers are subject to induction training and regular training updates throughout the year. We will:

- Attract and retain volunteers that reflect our diverse communities.
- Ensure equality of opportunity for all volunteers throughout every stage of employment; from recruitment, retention and exit from service.
- Recognise the needs of diverse groups within our volunteer workforce and ensure appropriate support is available.
- Provide training to increase the knowledge and confidence of all volunteers on issues relating to equality, diversity and inclusion.
- Cultivate an inclusive culture where all individuals are treated with fairness, dignity and respect.
- Recognise, challenge and effectively address any inappropriate behaviour, language or dignity at work issues that may arise.

## 5. Decision Making

The PCC makes many decisions, including formal decisions as part of the Corporate Governance Framework. The equality duty cannot be delegated, it is his personal responsibility, however staff should endeavour to ensure that the PCC has all information he needs before he is expected to make a decision. For this reason, every decision will be reviewed by the Chief Executive and Chief Finance Officer before being passed to the PCC.

Although formal decisions are taken by the PCC, (and occasionally other individuals in his name), all staff make decisions as part of their work. Everyone must therefore be aware of the requirements of the Act and consider the impact of activities on the individuals.

When making decisions we will have due regard to the need to eliminate conduct prohibited by the act, advance equality of opportunity, and foster good relations. The level of “due regard” considered sufficient in any particular context depends on the facts and the duty will be applied in a proportionate way depending on the circumstances of the case and the seriousness of the potential equality impacts on those with protected characteristics. We will avoid overly bureaucratic and burdensome approaches.

In advance of making a decision we will determine how much weight should be given to the various factors informing the decision. The duty does not mean that decisions

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cannot be taken which disadvantage some people (provided this does not constitute unlawful discrimination), but the decision-maker should be aware of the equality impacts of these decisions and consider how they could positively contribute to the advancement of equality and good relations.

The decision-maker should consider ways of preventing or balancing the effects that their decision may have on certain groups. They should decide which mitigations, if any, they might want to put into place in reconsidering the decision. The mitigation should be proportionate to the problem at hand.

The duty requires decision-makers to understand and take account of the consequences of their choices, having due regard to the aim of eliminating conduct prohibited by the act, advancing equality of opportunity and fostering good relations. We understand that making decisions without having due regard to the duty can be unlawful. As part of the decision-making process OPCC staff should outline in writing on the decision-making form (with supplementary papers as required) what equality assessments have been carried out to comply with the duty.

## 6. Supporting staff to deliver the Duty

We will ensure that staff have the knowledge and skills to be able to deliver the requirements of the duty. We will do this by:

- Delivering a broad programme of training, including:
  - Developing general knowledge of the protected characteristics, such as information about disabilities and religious practices
  - Customer service skills, including educating staff on correct terminology
- Ensuring we are up to date in respect of developments in equality, diversity and inclusion
- Ensuring templates and forms encourage consideration of equalities matters in day-to-day activity
- Providing guidance and templates for equality assessments (see separate template)
- Ensuring equality impacts are considered as standard in all policies, projects and activities
- Creating an approach to learning lessons where we could do better, participating in audits as appropriate

The Equality Assessment Template must be completed for all significant projects, policies or activities, or when there is a risk of a higher impact on some groups. Staff should seek advice from their line manager about whether their work requires an assessment.



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In other work, whilst a record does not need to be formally completed, staff should be able to demonstrate their considerations about the impact of the work that is being done. In order to meet the requirements of the duty it is important to consider the equality implications when making decisions. The following questions may assist in making an assessment of the impact of the work:

- Does this work affect people? How? What sort of people? (e.g. a new staff policy, funding a project)
- Have you considered the relevant Protected Characteristics and/or consulted people with specialist knowledge?
- How can we make sure communication about this work is accessible to all?
- Will the work create any problems or barriers to any community or group?
- Will any group be excluded because of the work?
- Will the work have a negative impact on community relations?
- How is the work likely to affect the promotion of equality and the elimination of discrimination in each of the areas? What is the evidence?
- How can you mitigate impacts on individuals or how should you work harder to ensure all views are heard?

## 7. Monitoring Compliance

We must demonstrate that we have met the requirements of the Act, in respect of publishing objectives and demonstrating compliance. We will do this by:

- Ensuring this strategy is refreshed every 2 years and the equality objectives are reviewed and replaced every four years
- Collating information about act compliance, with a short report published statement about compliance activity that has taken place each year
- Preparing and delivering against a series of actions as part of our OPCC Delivery Plan.