



Equality Impact Assessment Summary

Office of the Police and Crime Commissioner for Cleveland

Summary

Name of Product	Cleveland Divert
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Brief Description of Product	<p>Cleveland Divert aims to steer first time and low-level offenders away from the criminal justice system and towards support.</p> <p>It also signposts offenders towards help to address the problems, which lead to offending.</p> <p>Instead of charging and prosecuting offenders, Divert provides a range of support – known as pathways. They include help with mental health, substance misuse, education or housing problems.</p> <p>Participants are expected to engage with support to address the issues, which led to their criminal behaviour.</p> <p>As part of Divert, offenders may be asked to do something to re-pay the community. This may include voluntary or restorative work. If a victim requests that an offender takes part in Restorative Justice, that could form part of the offender’s programme.</p> <p>If offenders do not complete the programme, they risk being charged and taken to court for the original offence.</p> <p>The programme is commissioned by the OPCC and delivered in partnership between Cleveland Police, and Probation Service – North-East.</p>
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Product / Product Summary Attached	<p>Yes – This is the grant agreement with the previous service provider which was signed in March 2021. We are in the process of finalising an agreement with Probation Service – North-East to continue delivery beyond the end of March 2022 and the grant agreement will be updated accordingly, and will include recommendations in this EIA.</p>
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Department	Office of the Police and Crime Commissioner for Cleveland
Assessment Writer	Chris Guttridge
Date Started	3 rd December 2021
CEO/ACE Sign Off	Rachelle Kipling – 18/03/2022
EDI Manager Assurance	Jenni Salkeld -16/03/2022
Review Date	March 2023

Version Control

This is a living document and should be updated as we update our products and receive new insights and data on how our people or communities engage with our product.

Version	Date	Reason for update	Author
1.0	3/12/21	First Draft	CG
1.1	28/2/21	Second Draft to incorporate proposed changes to the eligibility criteria	CG

Please ensure you consult the Equality Impact Assessment Guidance while completing this document

Stage One – Early Thinking

Use this space to confirm if you are developing a proposal that will impact upon policies and practices that are likely to impact upon our communities or workforce. Consider If you aren't sure how your product may impact people due to their protected characteristics please use our [Equality Consideration Checklist](#).

Is an EIA required at this time?	Yes
If no, what is your rationale?	



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Stage Two – Identify Scope


Please consult the [Equality Impact Assessment Guidance](#) for suggestions as to consider how you might evidence both positive and negative impact. Where possible please provide references or links.

Sources	<p>The Code of Practice for Victims of Crime sets out the services and a minimum standard for these services that must be provided to victims of crime by organisations in England and Wales. Right 4 relates to victims having the right to be referred to services that support victims and have services and support tailored to their needs.</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974376/victims-code-2020.pdf</p> <p>Additional reading material considered:</p> <p>https://www.gov.uk/government/publications/police-crime-sentencing-and-courts-bill-2021-equality-statements/reforms-to-the-adult-out-of-court-disposals-framework-in-the-police-crime-sentencing-courts-bill-equalities-impact-assessment <i>Reforms to the adult out of court disposals framework in the Police, Crime, Sentencing and Courts Bill: Equalities Impact Assessment</i>, Home Office</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918192/impact-analysis-reform-of-the-adult-out-of-court-disposals-framework.pdf <i>Reforms to the adult out of court disposals framework in the Police, Crime, Sentencing and Courts Bill: Equalities Impact Assessment. Impact Assessment</i>, F. Abbot</p> <p>https://www.npcc.police.uk/Publication/Charging%20and%20Out%20of%20Court%20Disposals%20A%20National%20Strategy.pdf <i>Charging and Out-of-Court-Disposals: A National Strategy</i>, National Police Chiefs Council.</p> <p>https://committees.parliament.uk/writtenevidence/36233/pdf/ <i>Human Rights Issues Arising from Reform of the Out-of-Court Disposals Framework</i>, S. Grace and J. Grace</p> <p>https://mmuperu.co.uk/bjci/articles/women-and-criminal-justice-where-are-we-now/ <i>Women and Criminal Justice: Where are we Now?</i> J. Hine.</p> <p>https://commonslibrary.parliament.uk/ethnicity-and-the-criminal-justice-system-what-does-recent-data-say/ <i>Ethnicity and the Criminal Justice System: What does Recent Data Say on Over-Representation?</i> B. Yasin, and G. Sturge.</p>
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	<p>Cleveland Police Performance Dashboards and Reports (Internal Cleveland Police data)</p> <p>https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04 <i>Exploring the UK's Digital Divide</i>, Office for National Statistics</p> <p>https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7454901/ <i>A Double Burden of Exclusion? Digital and Social Exclusion of Older Adults in Times of COVID-19</i>, Seifert. A., Cotton. S. R., and Xie. B.</p>
<p>Consu ltation</p>	<p>A key objective of the Police and Crime Commissioner (PCC), as outlined in the Police and Crime Plan, is to ensure that there is Effective Quality Support to Victims and Witnesses of Crime in Cleveland. Public consultation was undertaken as part of the development of the plan. As part of this consultation public feedback was obtained as to what is needed from a victim support service. Specific work was undertaken with hard to hear groups as part of the consultation.</p> <p> Police%20and%20Crime%20Plan%20-%20</p> <p>Divert is currently reviewing the eligibility criteria with a view of incorporating some hate crime offences. As part of this process the Divert team has consulted with services – and the public, around the proposals. These meetings were conducted face to face and via video conferencing to get their views, and feedback. Due to the nature of the meetings, no quantitative data is available.</p> <p>Feedback from these stakeholder events approve of Divert as a programme – and commended the success that it was having in reducing reoffending, but had some concerns with incorporating hate crime, with key ones being:</p> <ul style="list-style-type: none"> • Cleveland Police’s current outcome rates and performance with hate crime more broadly • Hate crime is more visible in communities than other offences. <p>The consultation has not ended, but it has provided the team with information to consider.</p> <ul style="list-style-type: none"> • Divert is usually offender led, however when concerning hate crimes the process will be victim led due to the personal nature of the crime, this also provides the victim more options in relation to outcomes. • Victims will be provided with information around support relating to their protected characteristics



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	<p>The OPCC will continue to require police and probation partners to record feedback from victims and programme participants which will be used to shape future delivery as part of continuous service improvement. This will include highlighting the needs of, and any barriers to access from diverse communities as part of delivering a more accessible service across all protected characteristics.</p>
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Stage Three - Impact

What potential positive or negative impacts has your research and consultation revealed? Consult the [Equality Considerations Checklist](#) for previously identified impacts that may be relevant.

Age

Data & Background Information

Performance information for current service delivery between April 2021 and September 2021 reported the following age demographic of programme participants:

- 18-21 (20.2%)
- 22-25 (19.6%)
- 26-35 (20.8%)
- 36-45 (20.8%)
- 46-55 (12.5%)
- 56-65 (4.8%)
- Over 65 (1.2%)

Divert has an equal mix regarding proportion of cases, up until the age of 45-years-old. This could partly be due recording crimes generally being lower for older demographics, and partly due to a significant proportion of Divert's offences relating to Drunk and Disorderly and Possession of Drugs (47.8% of all accepted referrals) – of which is more prominent to younger age groups.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of 'Undisclosed' responses. This will allow the OPCC to monitor equal and effective provision across age demographics – and provide an evidence to seek assurances from the provider when disparities are indicated in the data and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.

The grant agreement for Divert's future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics where appropriate.



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The team are finalising plans to run a possession of weapons offences for 18-24 years as part of Cleveland Divert's future delivery. The rationale for attaching this limitation to the pilot is due to the following considerations:

- Divert is seeking to launch a smaller-scale pilot to test, whilst learning, if the approach is effective in responding to possession of weapons offences. At the review stage following the pilot (circa twelve-months) there will be a view to continue delivery, and open this intervention to all age-groups – pending they meet the remainder of the eligibility criteria
- The team are wishing to target the youth transitions age range to support Cleveland in addressing the serious violence issues in the area, and have prioritised this group of people for the pilot
- Representatives from the Divert team will be presenting this proposal to Cleveland Police's Standards and Ethics Board in prior to accepting any cases.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • Divert will be expected to provide support outside of 'core business hours', which we define as between 09:00 and 17:00 Monday to Friday. This assists those would be excluded from participating due to work, educational or family care commitments which would enhance the accessibility of the service across all age groups. • Home visits will be conducted by the team, or a meeting at an alternative public building will be arranged in agreement with the service user for those who are unable to travel. • Some meetings can also be conducted via telephone or video conferencing to further enhance accessibility • There may be occasions where the Divert participant have informed their families, or partners, of the offence, and/ or they are on the Divert programme. It is the responsibility of the Divert team to take practical and appropriate means to deliver the 	<ul style="list-style-type: none"> • Contact via telephone or video conference will not be appropriate for those that are digitally excluded by either the lack of knowledge and skills when using the technology and/ or those who would be unable to afford the technology.



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<p>intervention whilst respecting the participant’s confidentially.</p> <ul style="list-style-type: none"> • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer. • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	
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Disability

Data & Background Information

Performance information for current service delivery between April 2021 and September 2021 reported that 2.4% of participants considered themselves to have a disability.

Interpreter requirements are included within the initial assessment that is completed with the participant by their Divert Support Officer.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across disability demographics – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.



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The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.

If Divert incorporates hate crime within the eligibility criteria, it will provide victims of crime with this characteristic more options in relation to the outcome of the offence, and deliver an intervention with the participant to challenge their behaviour and provide victim awareness work which will make them aware of the consequences their behaviour has on others.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • It is acknowledged that people with disabilities are more likely to experience travel related issues – including a lack of available parking, suitable public transport and links. Meetings can be conducted by telephone or video conferencing to enhance the flexibility and accessibility of the service for those that may experience issues with travel or require greater flexibility. • Home visits will be conducted by the team, or a meeting at an alternative public building will be arranged in agreement with the service user for those who are unable to travel. • There will be an expectation for speech interpreters to be provided for hearing impaired people. • The service provider will be required to produce reading materials in a variety of formats – including easy-read and braille. • The team will seek to establish and confirm an appropriate adult where required (for example, where learning difficulties have been identified) • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these 	<ul style="list-style-type: none"> • Contact via telephone or video conference will not be appropriate for those that are digitally excluded by either the lack of knowledge and skills when using the technology and/ or those who would be unable to afford the technology.



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<p>services will be include in the service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer.</p> <ul style="list-style-type: none"> • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	
Gender Reassignment	
Data & Background Information	
<p>Performance information for current service delivery between April 2021 and September 2021 reported that 0.6% of participants stated that they were undergoing/had undergone gender reassignment.</p> <p>Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic, and the provider will need to incorporate this into current recording.</p> <p>Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across this demographic – and provide an evidence to seek assurances from the provider when disparities are indicated in the data and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.</p> <p>The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.</p> <p>If Divert incorporates hate crime within the eligibility criteria, it will provide victims of crime with this characteristic more options in relation to the outcome of the offence, and deliver an intervention with the participant to challenge their behaviour and provide victim awareness work which will make them aware of the consequences their behaviour has on others.</p>	
Positive Impacts	Negative Impacts



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<ul style="list-style-type: none"> • From initial contact, the Divert team will ensure that they are aware of the participant's preferred pronouns, and use them throughout that person's time on Divert. • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be included in the service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer. • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	<ul style="list-style-type: none"> • No negative impacts were identified at the time of writing.
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Marriage and civil partnership

Data & Background Information

Information relating to marriage and civil partnerships are recorded within the Divert assessments, which Divert Support Officers complete, but the data has not been reported back to the OPCC and has been identified as a gap in reporting which will be reviewed.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic, and the provider will need to incorporate this into current recording.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of 'Undisclosed' responses. This will allow the OPCC to monitor equal and effective provision across this demographic – and provide an evidence to seek assurances from the provider



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when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.

The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • There may be occasions where the Divert participant may not have informed their partner of the offence, and/ or they are on the Divert programme. It is the responsibility of the Divert team to take practical and appropriate means to deliver the intervention whilst respecting the participant’s confidentiality. • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/ signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer. • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	<ul style="list-style-type: none"> • The participant has not disclosed to their family/ partner that they are on Divert, but their family/ partner has discovered they are on the programme (such as by finding a letter, or hearing through a friend). • Home visits and meetings by telephone or video conferencing may be assessed as being inappropriate where domestic abuse has been identified although domestic abuse is not in the scope of Divert.

Pregnancy and Maternity

Data & Background Information

Information relating to pregnancy and maternity are recorded within the Divert assessments, which Divert Support Officers complete, but the data has not been



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reported back to the OPCC and has been identified as a gap in reporting which will be reviewed.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic, and the provider will need to incorporate this into current recording.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across this demographic – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.

The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • Where pregnancies are identified, the Divert Support Officer will consult with the participant to ensure suitable considerations are given to deliver a flexible intervention around any pregnancy related appointments • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/ signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer. • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel 	<ul style="list-style-type: none"> • No negative impacts were identified at the time of writing.



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safe and comfortable in the environment.	
Race	
Data & Background Information	
<p>Performance information for current service delivery between April 2021 and September 2021 reported the following race demographic of participants:</p> <ul style="list-style-type: none"> • White (85.1%) • Asian/ Asian British (3.6%) • Black/ African/ Caribbean/ Black British (1.2%) • Mixed/ Multiple Ethnic Groups (2.4%) • Not known/ Undisclosed (7.7%) <p>Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic.</p> <p>Divert has made large strides in closing the proportion of ‘not known/ undisclosed’ rates over the last eighteen months. This includes changes to when, and where this data is recorded. The data has been incorporated into, and now taken from, the initial Divert referral information – which does not always include the ethnicity information. In these instances, the team will liaise with the participant to make enquiries to close this gap. However, in the instances where a participant fails to engage in any capacity from the very start of their intervention – this information can-not be acquired.</p> <p>Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across race demographics – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.</p> <p>The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.</p> <p>If Divert incorporates hate crime within the eligibility criteria, it will provide victims of crime with this characteristic more options in relation to the outcome of the offence, and deliver an intervention with the participant to challenge their behaviour and provide victim awareness work which will make them aware of the consequences their behaviour has on others.</p>	
Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • It is recognised that third sector agencies may be better placed to 	<ul style="list-style-type: none"> • Some communities may become aware of Probation staff visiting a



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<p>provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer.</p> <ul style="list-style-type: none"> • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	<p>participant at their home address by observing them, which may inadvertently impact the participant in their local area.</p> <ul style="list-style-type: none"> • Some communities may be reluctant to engage with Probation staff and/ or Cleveland Police staff and feel stigmatised, and/ or shamed.
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Religion or Belief

Data & Background Information

Information relating to religion and beliefs are recorded within the Divert assessments, which Divert Support Officers complete, but the data has not been reported back to the OPCC and has been identified as a gap in reporting which will be reviewed.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic, and the provider will need to incorporate this into current recording.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across this demographic – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.

The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.

If Divert incorporates hate crime within the eligibility criteria, it will provide victims of crime with this characteristic more options in relation to the outcome of the offence, and deliver an intervention with the participant to challenge their behaviour and



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provide victim awareness work which will make them aware of the consequences their behaviour has on others.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> • It is acknowledged that some participants may wish for religious representatives to be included as part of the support package. All instances will be reviewed on a case by case basis in consultation with the participant and the associated individual. • It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/ signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer. • The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	<ul style="list-style-type: none"> • Some communities may become aware of Probation staff visiting a participant at their home address by observing them, which may inadvertently impact the participant in their local area. • Some communities may be reluctant to engage with Probation staff and/ or Cleveland Police staff and feel stigmatised, and/ or shamed.

Sex

Data & Background Information

Performance information for current service delivery between April 2021 and September 2021 reported the following sex demographic of participants:

- Female (41.7%)
- Male (58.3%)

Females have historically had a lower programme engagement rate than their male counterparts which is an item that is continually reviewed to ensure Divert is responsive to any additional support needs that are identified – and is used to promote higher engagement rates as part of future delivery. Divert employs a tiering system



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which is completed at programme entry and indicates pathway need and risks with an individual participant.

Tier 1 has the lowest need and risks identified and require a shorter intervention.

Females assessed as Tier 1: 20.0%

Males assessed as Tier 1: 29.6%

Tier 4's are the complex cases which require longer interventions to support the higher levels of identified needs.

Females assessed as Tier 4: 24.3%

Males assessed as Tier 4: 1.0%

As demonstrated in the data, females feature more predominantly towards the higher end of the tiering system. The levels of complexity and challenges to get Tier 4 cases to engage for a longer period of time are one of the key contributors towards the engagement rates.

Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic.

Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of 'Undisclosed' responses. This will allow the OPCC to monitor equal and effective provision across sex demographics – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.

The grant agreement for Divert's future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.

Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> From initial contact, the Divert team will ensure that they are aware of the participant's preferred pronouns, and use them throughout that person's time on Divert. It is recognised that third sector agencies may be better placed to provide additional support to participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the 	<ul style="list-style-type: none"> Tier 4 cases, which are mostly female, have higher need and risks identified, which requires them to engage with Divert for a longer period of time, due to the levels of complexity and additional support which are required.



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<p>service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer.</p> <ul style="list-style-type: none"> The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	
Sexual Orientation	
Data & Background Information	
<p>Information relating to sexual orientation is recorded within the Divert assessments, which Divert Support Officers complete, but the data has not been reported back to the OPCC and has been identified as a gap in reporting which will be reviewed.</p> <p>Accessibility will remain a key area of service delivery and the provider will need to ensure that delivery is reflexive to service user needs in relation to this characteristic.</p> <p>Performance reporting and data recording will require the service provider to provide this information on a regular basis – whilst minimising the rates of ‘Undisclosed’ responses. This will allow the OPCC to monitor equal and effective provision across sexual orientation demographics – and provide an evidence to seek assurances from the provider when disparities are indicated in the data, and provides an evidence base to inform where accessibility considerations need to be reviewed and considered.</p> <p>The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.</p> <p>If Divert incorporates hate crime within the eligibility criteria, it will provide victims of crime with this characteristic more options in relation to the outcome of the offence, and deliver an intervention with the participant to challenge their behaviour and provide victim awareness work which will make them aware of the consequences their behaviour has on others.</p>	
Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> It is recognised that third sector agencies may be better placed to provide additional support to 	<ul style="list-style-type: none"> No negative impacts were identified at the time of writing.



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<p>participants (for example, those with mental health needs) with these characteristics. Signposting and referral mechanisms to these services will be include in the service model. Referrals/signposting to referral agencies are recorded within the Divert assessment – which is completed by the Divert Support Officer.</p> <ul style="list-style-type: none"> The service provider will be required to ensure that their building(s), or public buildings where they have agreed to meet a service user has appropriate accessibility measures in place, and that the service user must feel safe and comfortable in the environment. 	
Other – Please clarify	
Data & Background Information	
<p>The grant agreement for Divert’s future delivery will contain conditions to enhance the accessibility of the service across all protected characteristics.</p> <p>Divert is the single largest referral source for restorative interventions to Restorative Cleveland. The specification and grant agreement for the provider of the RJ service post March 2022 (the service is still out to tendering at this time) will require them to work in close partnership with Divert.</p> <p>Restorative Cleveland’s future provider will be required to have their own equality impact assessment, and will be expected to feedback any accessibility concerns to the OPCC and the Divert Performance and Monitoring Group as part of programme governance. Divert will also feedback any accessibility concerns for Restorative Cleveland.</p>	
Positive Impacts	Negative Impacts
<ul style="list-style-type: none"> No positive impacts were identified at the time of writing. 	<ul style="list-style-type: none"> Privacy and confidentiality is important for all participants, regardless of protected characteristics. There is a risk of anyone cohabitating that may not have disclosed to their offence/ involvement in the programme to their family/ partner/ housemate



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	<p>that they are on Divert, but the others could discover they are on the programme (such as by finding a letter, or hearing through a friend). This could result in stress, conflict or breakdown of relationships with. It is important that the service provider supports the individuals on programme based on their needs, but providers will not disclose participation on the programme positively or negatively to members of the public.</p>
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Stage Four – Mitigation – Actions		
What can be done to mitigate/minimise negative impacts?		
Action	Action Owner	Action Status
<p>Privacy and confidentiality is important for all participants. There is a risk of anyone cohabitating that may not have disclosed their offence/ involvement in the programme to their family/ partner/ housemate that they are on Divert, but the others could discover they are on the programme (such as by finding a letter, or hearing through a friend). This could result in stress, conflict or breakdown of relationships with. It is important that the service provider supports the individuals on programme based on their needs, but providers will not disclose participation on the programme positively or negatively to members of the public.</p> <p>It is not the responsibility of Divert to disclose this information to the participant’s partner/ family/ housemates. The Divert Support Officer will respect the participant’s confidentiality and will negotiate appropriate methods of contact and meeting upon programme commencement.</p>	The Service Provider	Ongoing
<p>Contact via telephone or video conference will not be appropriate for those that are digitally excluded by either the lack of knowledge and skills when using the technology and/ or those who would be unable to afford the technology.</p>	The Service Provider	Ongoing



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<p>Home visits or meetings in an alternative location, will be arranged with the participant to ensure they are able to engage with the service. Bus passes will be provided to assist the participant negate travel related issues.</p>		
<p>Some communities may become aware of Probation staff visiting a participant at their home address by observing them, which may inadvertently impact the participant in their local area.</p> <p>Divert Support Officers do not wear uniforms, but do carry lanyards, and they may be recognised by others they have previously worked with. Divert Support Officers will negotiate contact locations with the participant at the commencement of their intervention.</p>	<p>The Service Provider</p>	<p>Ongoing</p>
<p>Some communities may be reluctant to engage with Probation staff and/ or Cleveland Police staff and feel stigmatised, and/ or shamed.</p> <p>Cleveland Divert is a voluntary programme, and the participant has to have pleaded guilty to the offence and accepted the Divert referral. The participant is also free to leave the programme at any point, but will be referred back to the Police Officer for the original offence to be formerly dealt with.</p> <p>Both Divert Police Officers and Divert Support Officers will liaise with the participant prior to them formerly commencing their intervention to ensure that they willing to proceed and engage. Any applicable concerns that are raised will be negotiated between the parties to ensure the participant consents to the programme.</p>	<p>The Service Provider</p>	<p>Ongoing</p>
<p>Home visits and meetings by telephone or video conferencing may be assessed as being inappropriate where domestic abuse has been identified.</p>	<p>The Service Provider</p>	<p>Ongoing</p>



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<p>Domestic abuse related offences are not within Divert's eligibility criteria and are not accepted under any circumstances. However, there are occasions where a participant has been referred to Divert and they are identified as being the victim of ongoing domestic abuse.</p> <p>Additional support is provided around this pathway need, and the Lead Divert Support Officer, and Divert Support Officer, will review these instances on a case by case basis and put a responsive contact plan in place, in negotiation with the participant.</p>		
<p>Tier 4 cases, which are mostly female, have higher need and risks identified, which requires them to engage with Divert for a longer period of time, due to the levels of complexity and additional support which are required.</p> <p>Tier 4 cases require longer interventions to address the levels of complexity. The levels of complexity over a longer period of time creates challenges to keep a participant engaged. Shorter and more condensed interventions are not considered appropriate.</p> <p>The participant will receive additional support and motivation to engage, and any instances of non-engagement are used as part of a continuous learning exercise.</p>	<p>The Service Provider</p>	<p>Ongoing</p>

To be filled in by CEO / ACE	
Stage Four – Mitigation – Risk Tolerance	
<p>Have we exhausted options to mitigate/minimise any negative impacts? List negative impacts we have not been able to mitigate here – these should be added to the relevant departmental risk register.</p>	
<p>Impacts we cannot mitigate</p>	<p>N/A</p>
<p>Which Risk Register have these impacts been added to?</p>	<p>N/A</p> <p>The above mitigations / actions will be monitoring through quarterly grant monitoring meetings.</p>



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Stage 5 – Sign Off

Once complete, you must send your completed EIA and the product or product summary to the EDI team at edi@cleveland.pnn.police.uk

The team will review your EIA and will either: provide final sign off, OR, return your document with further considerations and recommendations for you to implement.