



## Equality Impact Assessment Summary

### Summary

|                        |   |
|------------------------|---|
| Name of Product        | OPCC Resolution Team (Complaints and Compliments Model 3 Service)                   |
| Description of Product | PCC-led delivery of handling of complaints and compliments against Cleveland Police |
| Department             | OPCC – Resolution Team  |
| Assessment Writer      | Sharon Caddell  |
| Date Started           | 12/07/2021  |
| Head of Dept Sign Off  | Rachelle Kipling, 06/09/21  |
| EDI Manager Sign Off   | Jenni Salkeld, 08/09/2021   |
| Review Date            | Feb 2022  |

### 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     | 06.08<br>.2021 | New Service Business Case  | S. Caddell |
| 1.2     | 18.08<br>.2021 | Revisions to Business Case following discussion with Commissioner and EIA following discussion with Isaac Holmes | S. Caddell |
| 1.3     | 26.08<br>.2021 | Adjustments to EIA following EDI feedback  | S Caddell  |



## Equality Impact Assessment Summary

### 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?   |     |

### Stage Two – Identify Scope

You must list the specific sources of evidence that you have used within the EIA to ensure your product is inclusive. Please including links to any sources and details of any consultation work you have undertaken.

The following sources of evidence have been used for this EIA:

- OPCC Resolution Team Business Case Version 1.3
- [Police Reform Act 2002 \(legislation.gov.uk\)](#)
- Police Reform and Social Responsibility Act 2011 (PRORA 2011):  
<https://www.legislation.gov.uk/ukpga/2011/13/introduction>
- Policing and Crime Act 2017  
<https://www.legislation.gov.uk/ukpga/2017/3/introduction>
- [The Police \(Complaints and Misconduct\) Regulations 2020 \(legislation.gov.uk\)](#)
- Equality Act 2010
- Equality Consideration Checklist (Cleveland Police/ OPCC)
- [IOPC: Statutory guidance on the police complaints system \(policeconduct.gov.uk\)](#)
- Consultation undertaken with Supt Matt Walker from North Yorkshire Police Professional Standards Department (North Yorks operates a Complaints Model 3 Service)
- Consultation with EDI team
- Consultation with OPCC Complaints Triage Team and Cleveland Police DSE team
- External Audit (RSM) of handling of complaints against Cleveland Police – Aug 2021

It is my assessment that the introduction of the OPCC Resolution Team (known as ORT– the service will include Police Complaints Model 3, Police Compliments and Community Concerns Casework) service would have a largely positive impact across the whole of the public of Cleveland, including groups with protected characteristics because it will raise awareness of the public's right to express a

dissatisfaction or submit a compliment about Cleveland Police. Separately, the public will also be able to raise community concern issues with the OPCC, which can be handled under incidental community safety powers in the PRSRA 2011.

**Model 3 handling of police complaints will benefit all the public by enabling the Police to use that information, through analysis of complaint trend information, scrutiny themes, deep dives and lessons learnt. All of this can be used for the purpose of continuous professional development and improved legitimacy within policing of Cleveland's communities.**

The proposed routes to the Complaints Model 3 Service, which will be delivered by the ORT, include:

- Telephone. Calls can be answered during office hours by the ORT, and an answerphone facility will enable members of the public to leave a message if they call out of hours. There will be a text-phone option for people with hearing loss.
- Email: [OPCC-Resolutionteam@cleveland-pcc.gov.uk](mailto:OPCC-Resolutionteam@cleveland-pcc.gov.uk)
- Letter: c/o St. Mark's House, St Mark's Court, Thornaby, Stockton-on-Tees, TS17 6QW.
- Online:
  - expressions of dissatisfaction against the Force may be made explicitly on the social media profiles for the OPCC and/ or Force.
  - expressions of dissatisfaction against the Force can be made via a webform on the OPCC website
  - use of the link on the Cleveland Police website which links to the OPCC webform
- In person:
  - By prior appointment (to mitigate risk to staff members) at Cleveland Police Headquarters, or elsewhere on the police estate if that better suits the complainant.
  - Unannounced visits from complainants to Cleveland Police HQ will also be facilitated where possible and where staff are available, but this service cannot be guaranteed thus will not be advertised. The team leader or another senior leader will risk assess all in person contacts with members of the public.
  - The ORT will not normally conduct home visits unless there are compelling circumstances, for instance a profound disability, which make it unfeasible for the complainant to travel to the nearest police estate to meet. This will be risk assessed and managed by the Team Leader or another OPCC senior leader.
- Online/ in person:
  - by the complainant making use of a live connection platform such as Teams or Zoom

The above routes have been developed to be as comprehensive as is currently possible in terms of ensuring accessibility to those who might be disadvantaged by



## Equality Impact Assessment Summary

age, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion and/ or belief, sex, sexual orientation, socio-economic background, because they are ex-service personnel, or where any of the above characteristics intersect. At present, we do not foresee that the above groups will not be disadvantaged in terms of access to the new service, but impact will be kept under review during service implementation and through data analysis.

We have identified some potential barriers which may affect people with certain disabilities or those who speak limited English, which are detailed in Stage three below.

The introduction of the new service will help members of the public who wish submit a complaint or compliment against the police, or community concern regarding the area they live in.

| Stage Three - Impact   |   |
|--|---|
| What potential positive or negative impacts has your research and consultation revealed?   |   |
| Age  |   |
| Positive Impacts   | Negative Impacts  |
| <p>Access routes to the service include social media and organisational web page contact forms, which may be more convenient to younger people.</p> <p>Access routes to the service include telephone contact, and letters into the OPCC, which may be more convenient/ familiar to some older people who may not have access to, or are unfamiliar with using emails or internet.</p> <p>Access routes are available at all hours which is may suit members of the public from a broad age range. This may benefit people who are in education or full time employment.</p> | None identified at the time of writing.   |
| Disability   |   |
| Positive Impacts   | Negative Impacts  |
| There will be a text-phone option for people with hearing loss.  | The OPCC is compliant with web content accessibility guidelines version 2.1 AA standard. However, an audit of |

## Equality Impact Assessment Summary

|  |  |
|--|--|
| <p>The offer of home visits, where needed, is likely to impact positively on those who have a disability which makes leaving their home difficult.</p> <p>Emails and online contact form availability may impact positively on those with mental health and/ or neuro-diverse conditions, who may struggle with using the phone and who will have a number of alternatives.</p> <p>Additionally, the Cleveland OPCC and Cleveland Police website has a high standard of accessibility features that allow and inform service users to be able to control audio and visual settings to optimise access comfort on a bespoke basis. The website is written in plain English.</p> | <p>the OPCC website pages using WAVE software, (which checks website accessibility features) found some issues with layout and labelling. In a previous website audit, the OPCC also found issues relating to older PDF documents.</p> |
| <b>Gender Reassignment</b>   |  |
| <b>Positive Impacts</b>  | <b>Negative Impacts</b>  |
| <p>It will be promoted through targeted channels to reach members of transgender and non-binary communities to raise awareness of the service and routes available, in respect of enabling them to raise police complaints or compliments, or other community concerns they may have encountered.</p>  | <p>None identified at the time of writing.</p>   |
| <b>Marriage and civil partnership</b>  |  |
| <b>Positive Impacts</b>  | <b>Negative Impacts</b>  |
| <p>None identified at the time of writing.</p>   | <p>None identified at the time of writing.</p>   |
| <b>Pregnancy and maternity</b>   |  |
| <b>Positive Impacts</b>  | <b>Negative Impacts</b>  |
| <p>None identified at the time of writing.</p>   | <p>None identified at the time of writing.</p>   |
| <b>Race</b>  |  |
| <b>Positive Impacts</b>  | <b>Negative Impacts</b>  |
| <p>The new service promotes contact in respect of complaints or compliments about the police, or raising community concerns.</p>   | <p>Members of the public who speak limited or no English who wish to complain via in person contact (telephone or visit to OPCC/ front desk)</p>   |

## Equality Impact Assessment Summary

|   |   |
|---|---|
| <p>It will be promoted through targeted channels to reach members of minority ethnic groups to raise awareness of the service and routes available.</p> <p>Emails and online contact forms may be particularly useful contact methods for people who have limited English, as they will be able to alter the language settings and use auto-translate features in order to make contact with the OPCC.</p> <p>Additionally, Big Word is made available for online contacts.</p> | <p>or letter may be less likely to make a complaint due to lack of awareness of translation facilities.</p> |
| <b>Religion or Belief</b>   |   |
| <b>Positive Impacts</b>   | <b>Negative Impacts</b>   |
| <p>It will be promoted through targeted channels to reach members of faith communities to raise awareness of the service and routes available, in respect of enabling them to raise police complaints or compliments, or other community concerns they may have encountered.</p>  | <p>None identified at the time of writing.</p>  |
| <b>Sex</b>  |   |
| <b>Positive Impacts</b>   | <b>Negative Impacts</b>   |
| <p>None identified at the time of writing.</p>  | <p>None identified at the time of writing.</p>  |
| <b>Sexual Orientation</b>   |   |
| <b>Positive Impacts</b>   | <b>Negative Impacts</b>   |
| <p>It will be promoted through targeted channels to reach members of LGB+ communities to raise awareness of the service and routes available, in respect of enabling them to raise police complaints or compliments, or other community concerns they may have encountered.</p>   | <p>None identified at the time of writing.</p>  |
| <b>Other – Please clarify</b>   |   |
| <b>Positive Impacts</b>   | <b>Negative Impacts</b>   |
| <p>None identified at the time of writing.</p>  | <p>None identified at the time of writing.</p>  |

### Stage Four – Mitigation – Actions

| What can be done to mitigate/minimise negative impacts?   |                             |                |
|---|-----------------------------|----------------|
| Action  | Action Owner                | Action Status  |
| <p><u>Service delivery</u></p> <p><u>Inclusive service design</u><br/>The service has been designed to be customer focussed for the public in the first instance, which aligns with the spirit of the police complaints reform legislation.</p> <p><u>Recruitment</u><br/>In view of this, team members will be recruited on the strength of their interview performance, which will include specific questions to draw out their understanding and commitment to diversity, equality and inclusion.</p> <p><u>Training</u><br/>EDI training will be provided in the project implementation phase, and additional focus will be given to ensuring redress in respect of contact from members of the public who have disabilities, or who have limited ability or who may have limited English.<br/>Team members will also receive customer focus training, prior to the commencement of the service. This will be refreshed at regular intervals by means of PDR objectives, or by linking in with broader Force programmes.</p> <p><u>Supervision</u><br/>The ORT team will be subject to regular supervision and oversight from the team leader, in order to pro-actively detect and deal with any service delivery issues.</p> <p><u>Accountability</u><br/>A chain of accountability has been established, to ensure checks and balances to deal with performance, capability or complaint issues against them, as follows:<br/>Standards and Scrutiny Manager, Head of</p> | <p>OPCC Chief Executive</p> | <p>Ongoing</p> |



## Equality Impact Assessment Summary

|  |                         |         |
|--|-------------------------|---------|
| Paid Service (Chief Executive, or Deputy or Assistant where delegations are in place)  |                         |         |
| <u>Race characteristics</u><br>Training will be given to members of the ORT team to ensure they are aware of interpretation and translation services to assist those with limited or no English to be make a complaint, or submit a compliment or community concern. | EDI Team                | Ongoing |
| <u>Website accessibility</u><br>The OPCC plans to fix or replace the majority of its documents, (but not all, because of excessive costs). It will be addressing this in its forthcoming accessibility roadmap.  | OPCC Comms Team         | Ongoing |
| <u>Targeting community organisations</u><br>We will use communication channels to engage and raise awareness of the service with community organisations in order that they may assist their service users to submit a complaint, compliment or community concern.   | Complaints Project Team | Ongoing |

### Stage Four – Mitigation – Risk Tolerance

Have we exhausted options to mitigate/minimise any negative impacts? List negative impacts we have not been able to mitigate here.

Impacts we cannot mitigate

N/A

Does your head of department approve of tolerating this risk?

Yes/ No – *delete / add to business area risk register as appropriate.*

### Stage 5 – Sign Off

Once you have completed your assessment and product you must request your head of department sign them off. You then need to send your completed EIA summary and the product you have assessed to the EDI team:

[everyonematters@cleveland.pnn.police.uk](mailto:everyonematters@cleveland.pnn.police.uk)

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





# Equality Impact Assessment Summary