IMPACT Programme

Report of the Outcome of an Equality Impact Assessment

May 2007 – March 2009
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Foreword by the Chief Executive and the IMPACT Programme Director

The work of the IMPACT Programme is crucial to improving the way that the Police Service manages and shares information, which in turn is crucial to improving the Service’s ability to prevent and detect crime, and to make communities safer. These are important goals that will deliver significant benefits not only to the Police Service but also to the public and we are committed to delivering them. However, we are conscious that the management and sharing of information could raise equality and diversity concerns and we are keen to ensure that these are addressed as fully as possible.

This report summarises the outcomes of an Equality Impact Assessment that the Programme has undertaken, the actions that are being taken forward and the stakeholders with which the Programme has consulted. This report is only the first full assessment. Equality and diversity will also continue to be considered and assessed for the duration of the Programme. The Programme also intends to formally review this report at key milestones during the design and implementation of the Police National Database. Further full assessments will be carried out, where necessary, either at these points or if other circumstances arise which require one.

The NPIA are committed to ensuring that equality and diversity are continuously considered across the organisation, and in all aspects of the IMPACT Programme. It is hoped that this report and our continued work successfully demonstrates this commitment to you.

Peter Neyroud  
Chief Executive

John Crosse  
IMPACT Programme Director
Executive Summary

1. Chapter 1 introduces the key work areas of the IMPACT Programme, explains how the Programme sits within the National Policing Improvement Agency (NPIA), and outlines the commitment to the Programme by key stakeholders. It summarises how the Programme was established following the murders of Jessica Chapman and Holly Wells in August 2002, the conviction of Ian Huntley in 2003 and Sir Michael Bichard’s subsequent Independent Inquiry. The report of that Inquiry, published in June 2004, outlined 31 recommendations for improvement across the Criminal Justice System, of which the IMPACT Programme is leading on seven.

2. Chapter 2 outlines why it is important that Equality Impact Assessments are undertaken, and how the Programme has taken forward this area of work.

3. Chapter 3 outlines the methodology used and the outcomes of the initial screening leading to the need for a full assessment.

4. Chapter 4 details the review of relevant data and research, and the background and methodology used in consulting and engaging with users, stakeholders and the wider community. It then goes on to look at the outcomes of the full assessment of the Equality Impact Assessments, and the recommendations that the Programme is making to ensure that equality and diversity are considered throughout the Programme’s work.

5. Chapter 5 concludes the Equality Report and outlines the review point at which the Programme will continue to assess its commitments and the impacts of its work upon all of the equality and diversity strands.

6. Chapter 6 contains the Equality Action Plan to which the IMPACT Programme will be working to deliver over the course of the next 12 months.

7. Annex A lists the Bichard Recommendations that the IMPACT Programme is working towards.

8. Annex B provides additional information on the three key work streams of the Programme:
   - helping forces to meet the requirements of statutory Code of Practice on the Management of Police Information (MoPI);
   - the national implementation of the IMPACT Nominal Index (INI), an interim system delivered in December 2005 which allows officers in one force to quickly identify which forces may hold information on someone in whom they are interested; and
   - the national implementation of the Police National Database, which will be an extensive source of operational police information.

   The information within these chapters is intended to provide a context for this paper.

9. Annex C details some of the major planned processes of the PND.
Chapter 1: Introduction to the IMPACT Programme

1.1 Following the murders of Jessica Chapman and Holly Wells in August 2002 and the subsequent conviction of Ian Huntley in December 2003, Sir Michael Bichard was tasked by the (then) Home Secretary to lead an independent public inquiry into child protection measures, record keeping, vetting and information sharing in Humberside Police and Cambridgeshire Constabulary. The Inquiry Report, published in June 2004, and the 31 recommendations it contained, were accepted in full on behalf of the Government by the (then) Home Secretary.

1.2 The Inquiry highlighted shortcomings in how the Police Service managed and shared information. For example, the processes for the capture, review retention, deletion and sharing of information were, Sir Michael concluded, often inadequate and inconsistent. He also noted that, whilst there are national systems such as the Police National Computer (PNC) to which all forces have access, there were "no firm plans for a national IT system" for recording and sharing intelligence. So, whilst information like cautions and conviction are available nationally, forces were often unaware of, or found it difficult to access, the intelligence and wider operational information held by other forces.

1.3 The IMPACT Programme was established by the Home Office as an important and substantial element of the Government’s response to Sir Michael Bichard's report. The Programme is responsible for implementing those of his recommendations relating to the management and sharing of information by the Police Service. These seven recommendations are listed in Annex A.

1.4 The Programme’s objective is to improve the ability of the Police Service to manage and share intelligence and other operational information, to prevent and detect crime and make communities safer. IMPACT is not just an IT programme; it is helping the Police Service to deliver fundamental business change improvements enabled by IT and, in doing so, to address the information management challenges identified by Sir Michael.

1.5 IMPACT is judged a ‘mission critical’ programme by the Home Office under Office of Government and Commerce (OGC) guidelines. It is a key deliverable for the NPIA and rated as a priority delivery programme by the Association of Chief Police Officers (ACPO) and the Association of Police Authorities (APA).

1.6 The Programme’s current work covers two main strands of activity:

   a. helping forces to implement the requirements of the statutory Code of Practice and supporting Guidance on the Management of Police Information (MoPI), which provides a national framework for improved and more consistent processes for managing information (Bichard recommendations 8-11); and

   b. delivering a new Police National Database (PND) – an extensive store of police intelligence and other operational information, containing and linking locally held data (Bichard recommendations 1 and 4).

1 The Police Service classes intelligence as operational information that has been evaluated as to its likely accuracy, reliability etc.
1.7 The Programme was also responsible for developing the IMPACT Nominal Index (INI) and, until April 2008 when it was transitioned to the NPIA’s Operational Services Directorate, for the operation of the INI service. The INI provides a means for an investigating officer in one force to quickly and efficiently establish which other forces might hold information on an individual of interest to their enquiries. The INI addresses Bichard recommendation 2.

1.8 Further information on each of these three work strands is available at Annex B.

1.9 Originally launched under the Police IT Organisation (PITO), the Programme transferred to the Home Office in 2005 and then became part of the National Policing Improvement Agency (NPIA) on 1 April 2007. The NPIA is a Non-Departmental Public Body of the Home Office, which supports policing in England and Wales and helps forces to improve the way in which they work across a range of policing activities and policy areas.

1.10 Further information regarding the Bichard Inquiry and the ongoing implementation work, including the IMPACT Programme, can be found at: police.homeoffice.gov.uk/operational-policing/bichard-fourth-progress-report

1.11 Further information on the NPIA can be found at: www.npia.police.uk
Chapter 2: High Level Summary

2.1 The main purpose of an Equality Impact Assessment is to ensure the systematic delivery of equality of opportunity and treatment, and the promotion of good community relations. It requires those responsible for developing and delivering policies or other initiatives to think carefully about the likely impacts (both positive and negative) and to take action where necessary to improve the policy or other initiative.

2.2 The assessment encompasses the following equality and diversity strands:
- Race;
- Disability;
- Gender;
- Gender Identity;
- Religion and Belief;
- Sexual Orientation; and
- Age.

2.3 There is a legal requirement for programmes such as IMPACT to conduct an Equality Impact Assessment.

2.4 Equality Impact Assessments are undertaken in 2 stages. The first stage consists of an initial screening of the policy or initiative to decide whether a full assessment is required. All issues emerging from the initial screening are then included within the full assessment which focuses on more in-depth analysis and consultation. This requires active and ongoing engagement with interested bodies to ensure as wide a range of views as possible has been considered, and also to give those interested in the process an opportunity to identify potential unintended consequences.

2.5 An initial screening was undertaken by the IMPACT Programme in 2007. It concluded that the aims of the Programme did not conflict with equal opportunity, the elimination of discrimination and the promotion of good relations. However, there was a possibility that the information that will be shared through the INI and PND, the way that the PND is developed and the way the systems are used could raise equality and diversity issues. As a result, a full assessment was conducted during 2008 and early 2009.

2.6 The purpose of this document is to draw together the main findings of the initial screening and full Equality Impact Assessment, outline the action already taken in respect of these findings and describe how equality and diversity will be taken forward as a key element of the work of the Programme.

2.7 In carrying out this assessment, we focussed on what the Programme has delivered or is delivering. We recognised that there are wider equality and diversity issues around police information and how it is managed and used. Whilst some recommendations have emerged relating to these, it is ultimately for forces to ensure their own policies and practices are compliant with equality and diversity requirements.
Chapter 3: Initial Screening

3.1 An initial screening was carried out of the 3 main work strands. This involved reviewing the aims, objectives and projected outcomes of each, and then considering what, if any, implications there might be for different groups, and more widely for equality of opportunity. In doing so, we consulted:
- the NPIA Equality, Diversity and Human Rights team;
- NPIA training and development colleagues;
- colleagues within IMPACT, both those leading on each work strand and those that were developing the various business cases that the Programme has to produce; and
- the Strategic Diversity Action Team in the Home Office.

3.2 The findings of this initial screening indicated that the aims of the overall Programme and each of its 3 main workstrands did not conflict with equal opportunity, the elimination of discrimination and the promotion of good relations. However, it was felt that the wider visibility of information provided by the PND could exacerbate issues, given that members of some Black and Minority Ethnic (BME) groups come into disproportionately high levels of contact with the police, and that different communities may have different experiences or attitudes in relation to the police and the information the police hold. In addition, whilst it was not felt that the INI or the PND intrinsically raised any equality issues, the way they, and the information obtained from them, are used could raise equality issues. Both therefore merited full assessments. These initial screening documents are attached as appendices 1 - 3.

3.3 The Programme is helping forces to implement MoPI, rather than creating a new policy. The MoPI Code of Practice and Guidance were also subject to extensive consultation. Given these and the fact that MoPI is all about ensuring that information is managed in a more consistent and objective manner, it was not felt that it raised any real equality issues. However, it was decided that it should also be subject to a full assessment in case there were issues which had not been picked up in the screening.

3.4 One immediate outcome of the screening work was that the Programme identified a need to ensure that equality and diversity were properly considered in all significant Programme decisions: this was added to the terms of reference for our Programme Board and Business Design Authority, and an “Equality Impact” heading was added to the template for briefing papers.
Chapter 4: Full Assessment

Statistics and Research

4.1 The first stage of the full assessment involved looking at what relevant data and research existed at both a national level and regarding each work strand, what trends and patterns these showed and what further research was needed to fill any gaps.

4.2 Testing of disproportionate or adverse impact through statistical data was extracted from the following national documents;

- Statistics on Race and the Criminal Justice System 2006 (October 2007)
- Crime in England and Wales 2008/08 – Findings from the British Crime Survey and police recorded crime
- Police & Racism: What has been achieved 10 years after the Stephen Lawrence Inquiry Report (EHRC, 2009)

4.3 Section 95 of the Criminal Justice Act 1991 led to new measures to establish consistent ethnic monitoring within the police service. The areas of police activity monitored initially were: stop and searches, arrests, cautions and homicides. As a statistical publication, it does not aim to provide a detailed commentary on the figures or analysis of disproportionality. Nevertheless, statistical analysis here shows that;

- Members of our Black communities are seven times more likely than their White counterparts to be stopped and searched, three and a half times more likely to be arrested, and six times more likely to be in prison;
- Relative to the general population, Black people were 3.5 times more likely to be arrested than White people (compared with 3.4 times more likely the previous year). There were variations across forces in the proportions of individuals from different ethnic groups being arrested for specific types of offence;
- There was a lower use of cautioning for Black offenders relative to arrests (14%) compared with White offenders (20%);
- People of Mixed ethnicity were more likely to attract a final warning and intervention than people of other ethnic groups, and were more likely to be in prison than their white counterparts; and
- Offences committed by Black young offenders were more likely to attract a custodial sentence when compared to offences committed by other ethnic groups. However, it is important to bear in mind that the decision to impose a custodial sentence can be influenced by a variety of factors including the nature and seriousness of the offence.

4.4 The EHRC, using its own calculations together with a range of official statistics suggest that more than 30% of all Black males living in Britain are on the National DNA Database (NDNAD), compared with about 10% of White
males and 10% of Asian males. Further that Black men are about four times more likely than White men to have their DNA profiles stored on the police NDNAD. Concern was expressed that race patterns on the database could strengthen the tendency for ‘ethnic profiling’ – stereotyping black men as the prime suspects for particular offence types because of their over representation on the database. Also that samples or DNA records could be sold to commercial research companies. Although disproportionality on the NDNAD could simply reflect the disproportionality in arrests, there is no evidence to show that data is being loaded disproportionately onto the database.

4.5 Confidence in the local police varies according to certain demographic and socio-economic characteristics, with certain groups being more likely to perceive the local police as doing a good or excellent job. In general, levels of confidence in the Criminal Justice System (CJS) were more likely to be higher among women, younger people, BME groups, those in private-rented accommodation and those who had not experienced crime in the past 12 months. As an example 59% of people from BME backgrounds rated the local police as doing a good or excellent job compared with 52% of people from White backgrounds. The organisation considered to be discriminatory on the grounds of race by the largest proportion of people from minority ethnic groups is the police (22%), although this has gone down since 2001.

4.4 Examination of existing data across the three work strands demonstrates the positive impact that the INI has had within the Police Service by the number of operational searches carried out on the system. Over the 12 months to March 2008 use of the INI tripled to around 36,000 searches per month, with around 1 tenth leading to follow up enquiries. By the end of November 2008 874,470 search and find enquiries had been carried out since implementation. March 2009 had the most number of search and find enquiries with 78,912 carried out in that month. Surveys indicated that in around a third of these instances information recovered was of value to the investigating officer. Surveys have also indicated that in around 670 cases a year referred to the Police under section 47 of the Children Act 1989, the information obtained caused a different decision to be reached with clear benefits in terms of the safety and welfare of the children concerned.

4.5 There were 69 million records on the system by the end of March 2009. Whilst in theory it might be possible using the INI to check the number of records by gender or age range (the INI does not include any information on the race, disability, gender identity, religion/belief/non belief, or sexual orientation of subjects), this would be at best, time consuming and would not necessarily accurately reflect numbers, as any individual might have more than one record on the system (due to coming into contact with more than one force, or multiple contacts with the same force). The linking and matching of records relating to the same person is an area that is being addressed through the ongoing development and implementation of the PND.

4.6 The INI is only an index and an interim system, and establishing a breakdown of the records/individuals held by the Police Service on gender, age, race, disability, gender identity, religion/belief/non belief, or sexual orientation could only be completed at disproportionate cost. There are therefore no plans to commission further research.
4.7 There is no quantitative data available with regard to the impact of MoPI on equality issues and as with the INI, establishing a breakdown of the records held by the Police Service and how they are managed across the same groups could only be completed at disproportionate cost. Again there are no plans to commission further research.

4.8 Following an independent review of the data currently collected, the Office of Criminal Justice Reform (OCJR) is leading a programme of work to improve the statistics published on race and the Criminal Justice Service (CJS). A key part of this work is a Minimum Data Set (MDS) which will map out clearly for the first time the management data that needs to be collected to performance manage the CJS in relation to race. The primary aim of the MDS is to enable practitioners and policy makers to;

- Identify disproportionality in the CJS;
- Begin to understand the causes of disproportionality;
- Performance manage the CJS in relation to race issues; and
- Demonstrate accountability to BME communities.

4.9 This MDS will continue to be required to be submitted individually by all police forces in England and Wales. Individual forces are responsible for managing their information ensuring from the point of collection through to it’s loading onto the force information systems and ultimate use that it complies with equality, diversity and privacy legislation. It will be for each force to determine what and how much of their information they upload onto the PND.

4.10 Given that few equality issues have been raised at this stage and the limited information available in respect of each work strand, it has not been possible to identify any trends or patterns. The most accurate method for researching concerns in respect of disproportionality, or discrimination will remain with forces. However the development of the PND must consider ethnic monitoring within a range of other existing and future performance requirements. (See recommendations).

Gathering evidence through community engagement

4.11 Gathering further evidence through consultation with both internal and external stakeholders is the next, and a crucial, part of an Equality Impact Assessment. The next task was therefore to establish who those stakeholders were, what their views were, what previous consultations had been carried out and what the results were. Whilst we discovered that no specific consultation or other work on equality and diversity had previously been undertaken, there had been considerable opportunity for key stakeholders to raise any equality and diversity concerns, including:

- the Police Service and other internal and external stakeholders were extensively consulted as part of the Bichard Inquiry;
- various interested parties - such as the Association of Chief Police Officers (ACPO), the Association of Police Authorities (APA) and the Ministry of Justice (MoJ) - are represented on the Bichard Strategic
Implementation Programme Board, which co-ordinates the delivery of the Bichard Recommendations;

- four reports have been published on progress on the Bichard Recommendations. These are cleared with Ministers in interested Departments;

- two adjournment debates have been held in Parliament, in February 2006 and February 2007, regarding progress on the Bichard Inquiry recommendations, particularly focussing on the work of the IMPACT Programme. Neither of the debates raised any equality or diversity issues;

- the Code of Practice on the Management of Police Information (MoPI) was the subject of consultation with a range of organisations and stakeholders, including Liberty, police staff associations, Government departments, Unions, Victim Support, child protection charities and the wider law enforcement community. The development of the associated Guidance was influenced and enhanced by widespread consultation with chief officers, subject experts and practitioners within the Police Service, as well as through extensive contact with experts on information management from other organisations. The MoPI Code and Guidance form part of the data preparation and management processes which underpin the Police National Database (PND); and

- ongoing discussions with key stakeholders as the work of the Programme was being taken forward.

4.12 Whilst these had not raised any equality and diversity issues, the Programme decided there was a need to provide the wider community and interested organisations with an opportunity to comment specifically on equality and diversity concerns with regard to the work of the Programme. It was therefore decided that a full public consultation should be conducted.

4.13 The Equality, Diversity and Privacy Consultation was opened on the 14 January 2008 and ran for 12 weeks, as recommended by the Cabinet Office Consultation Criteria, closing on the 4 April 2008.

4.14 The consultation document was sent directly to all 43 police forces in England and Wales and to 47 other organisations covering a range of viewpoints. There were also 800 unique visits – i.e. from different internet accounts – to the consultation document on the NPIA website.

4.15 A total of 17 responses were received to the consultation, mainly from police forces, police authorities or police related associations. Most of the responses focussed on the development and implementation of the Police National Database. A significant percentage of the responses related to privacy and have been taken forward as part of the Programme’s Privacy Impact Assessment.

2 The Programme has been conducting a separate Privacy Impact Assessment, which also involved a consultation process and it was decided to bring the two together.

3 A Report on the Outcome of the Equality, Diversity and Privacy Consultation was published on the NPIA website on the 4 July 2008 and is available at www.npia.police.uk/en/docs/Consultation_Response_paper_v1_0.pdf.
4.16 Whilst the consultation did raise some useful and interesting issues, the low number of responses and the narrow range of organisations responding was disappointing and the Programme was keen to gain a wider input to this work. To achieve this, the Programme conducted a range of engagement and consultation activities through the latter part of 2008 and early 2009 including:

- Presentation seeking views of the NPIA Independent Advisory Panel;
- One to one interviews;
- Local community engagement events;
- Radio interview; and
- National stakeholder engagement workshop. (List of consultees at Appendix A)

INI

4.17 Whilst the INI itself was not considered to raise any equality issues, use of the system could do. Material was therefore added to the Business Rules to stress the need to consider equality and diversity issues in using the INI and any data obtained from it. The rules also recommend that auditors monitor usage for any unusual or suspicious patterns of enquiries, including anything which suggests discriminatory behaviour.

MoPI

4.18 MoPI covers all aspects of information handling and should provide a more consistent and systematic approach to information management. The Programme is assisting forces in producing and reviewing action plans for implementation of MoPI and the situation will continue to be monitored as implementation progresses.

4.19 Concern was raised relating to the terminology and language that may be used when recording information, and sensitivities in collating, using and sharing information. The Programme has recommended that forces should be encouraged to take equality into consideration when implementing MoPI and that Force Action Plans should be reviewed accordingly. As a result a recommendation was made to the Programme Board that this should be addressed through an addendum to MoPI Guidance to specifically include the need to consider equality and the promotion of good relations, and highlighting the need for an awareness of language, terminology, and sensitivity with regard to all equality and diversity issues when collating and sharing information. Work has now commenced on updating the Guidance which will be completed later in 2009. Advice will be issued to forces in the interim.

4.20 A further issue was raised relating to the effective implementation of legislative changes in respect of individuals suspected but not charged with an activity that would have been an offence prior to the change. Whilst the MoPI Guidance does outline how to deal with records when an offence is re-categorised under the law to carry a greater sentence, it does not explicitly cover the sort of cases highlighted in the response. Following a recommendation to the Programme Board, an explanatory paragraph regarding handling amendments to legislation will be included in the current
review and update of the MoPI Guidance and advice will be issued to forces in the interim.

PND

4.21 There were no major concerns raised regarding the equality and diversity of the PND itself, and generally, those internal consultees that responded felt that existing police force policies and practices were sufficient to prevent any adverse impacts on equality. The equality issues raised through this consultation can be summarised as;

- Controlling use (need for a statutory Code of Practice, Business Rules and training);
- Language and terminology;
- Collating, recording and sharing information;
- Data quality and security; and
- Victims and Witnesses.

4.22 These issues were mirrored during the wider consultation as referred to at 4.16. The majority of those consulted were concerned about the inclusion of victim information other than on a case by case basis and where necessary or relevant and were clear that witness information should not be included. Where victim information was included this should ideally be through informed rather than implied consent and in any event the victim should be advised that their details would be on the PND. It was considered that the benefit of including medical information outweighed any risks with the caveat that the information should be accurate and relevant. These concerns are addressed within the Programme’s Privacy Impact Assessment.

4.23 Additional concerns were raised which would not have a negative impact themselves but which might assist in providing reassurance to the public and maintaining confidence in the police.

- Communication - All those consulted recommended that the implementation and deployment of the PND should be communicated effectively to suit the particular audience, reflective of their specific needs and level of understanding;
- The Name – Some of those consulted believed the name for this database was Orwellian, suggestive of a police state and more ‘Big Brother’. They believed this had the potential to undermine effective communication and buy in from the public; and
- Independent Scrutiny – All those consulted felt strongly that there should be independent scrutiny to monitor for disproportionality, discrimination, or misuse. It was suggested that an Ethics Committee be set up similar to that for the NDNAD.

4.24 These concerns together with all potential impacts on equality and means of minimising adverse impacts, maximising equality of opportunity and good community relations, will continue to be considered throughout the procurement, design, build, implementation, and delivery of the PND.
4.25 There is a requirement on the supplier to demonstrate compliance with the relevant equality and diversity legislation. All bids submitted have undergone evaluation of commitment to the Delivery of Social Responsibilities which includes equality and diversity.

4.26 Support for the Welsh Language was raised. The Programme has given due consideration to the requirements of the Welsh Language Act 1993 and the Home Office’s Welsh Language Scheme. However, the Act and the Home Office scheme apply to public services and the PND will not be providing services directly to the public; the system will only be accessible by authorised police officers and staff. In view of this, and the significant additional costs involved, the Programme has concluded that neither a Welsh language version of the user interface nor copies of the information in Welsh are necessary or practicable.

Assessment and Analysis

4.27 The main findings of the consultation to date relate to the following:

- Language and terminology;
- Collating, recording and sharing information;
- Ensuring there is a policing purpose; and
- The implications of changes to legislation.

4.28 A number of further findings relate more specifically to privacy. This was expected given the decision to jointly consult on both equality and privacy. Some of these findings have been alluded to within this Impact Assessment. However it is recommended that the Privacy Impact Assessment be read in conjunction with this Equality Impact Assessment for detailed response. As an indication the following findings are addressed within that assessment:

- Accuracy and linking of data;
- Review, Retention & Disposal;
- Security;
- Access;
- Victim, Witness & Medical information;
- Monitoring and Auditing; and
- Independent Scrutiny.

4.29 Chief Officers must have ‘due regard’ to the MoPI Code of Practice and therefore to the Guidance, both of which are underpinned by the Data Protection Act 1998 and the Human Rights Act 1998. The MoPI Code of Practice and Guidance will promote, and its’ implementation should improve, consistency in the management of police information in England and Wales. By raising the issue of the language and terminology used in police records, it should also help to ensure that inappropriate language is not used which could support stereotyping and otherwise damage community relations.

4.30 Given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately
represented in police information. Whilst the INI and PND will not affect this, the wider visibility and sharing of information between forces could exacerbate issues associated with this.

4.31 Consideration should be given to what information is recorded about an individual, and whether there is a policing purpose for collating and sharing that information. However all forces should already be assessing their information for equality and diversity issues as part of regular data management checks.

4.32 Forces have been instructed not to load information on victims and witnesses and users are instructed that no undue inference should be made about an individual simply because that person’s details match those of one or more records on the INI.

4.33 The INI is not considered to have any effect on equality of opportunity. The INI is one step in the process towards the improved and more consistent sharing of information across the Police Service. The PND is a further step in this process. It should help to ensure that crimes can be better prevented and detected, and that investigations are not subject to inequalities brought about by the varying ability across the Service to locate relevant information. MoPI is simply improving the effectiveness and consistency with which the Police Service manages information and how it abides by the requirements of the Data Protection and Human Rights Acts.

4.34 The only potential for exclusion of certain groups of people from obtaining services, or limit their participation in any aspect of public life, is where information exists which suggests that allowing them to do so would pose too great a risk to others – for example, preventing someone working with children or vulnerable adults where information exists that indicates that that person could pose a threat to such people.

4.35 The INI is making it possible for police forces to work more effectively together as it provides a means for locating and sharing of information that was not previously available. To obtain the actual information after conducting a search of the system, contact must be made with the force which owns the data in order for it to be released. This promotes both better working relations between forces, and assists to remove barriers in the prevention and detection of crime, and the safeguarding of vulnerable people.

4.36 The data available to date highlights the positive impact of the INI system which has improved ability to proactively use information for intelligence purposes between police forces and other partner agencies in reducing risk to and safeguarding children and vulnerable people, increasing the prevention and detection of crime, increasing the ability to counter terrorism and serious and organised crime, improving police efficiency, and increasing public confidence in the police.

4.37 The INI is an interim system that will be in use until the capabilities that it provides are superseded by the PND, thus there is limited scope for making changes.

4.38 In addition MoPI Peer Reviews and other outreach work, consultations and regular contact between forces, the Regional Coordinators, will continue to
ensure that forces/users and other stakeholders are kept informed about new developments, and are given a chance to voice any concerns including on equality.

4.39 Proper use of the PND system would not result in discrimination. It is in the abuse or improper use of the system or the information held that a risk of discrimination resides. The Programme is working to ensure that the way the system is designed, and the way in which it is used, is not discriminatory.

4.40 There are various channels that members of the public and staff can bring concerns/complaints in relation to discrimination.

4.41 All the concerns raised to date have been assessed and actioned in the following ways;

- Recommendations;
- Reassurance that existing Business Rules provide the answer;
- Inclusion within the Equality Impact Assessment Action Plan; and
- Redirection to the relevant business area within the Programme.

4.42 Further recommendations for ensuring equality issues are adequately considered and addressed are:

- Auditing of the INI system – Whilst the Programme has provided advice, Chief Officers are currently left to decide on the auditing policy for their forces, and to carry the risks of that decision. There is no absolute minimum requirement for the number of searches that are audited. A more robust and consistent auditing system would reduce the possibility of the INI system being abused. The National User Group is now considering the appointment of a National Auditor.

- It is recommended that the ongoing work to ensure that there is no victim and witness information on the INI continues. The Programme team provide forces with strategies and criteria to check and improve the quality of the information on the system.

- Future MoPI Peer Reviews, workshops etc to specifically consider equality impact issues. The second set of Joining Up Workshops held in July 2008 included this as a first step.

- The development of the PND must consider ethnic monitoring, other existing performance requirements and potential future performance requirements. Data must be entered on the system, if required, in a format that is easily extractable for performance purposes.

- Consideration should be given to the wider government strategy regarding equality and diversity to ensure that the PND complies, for example, with the Home Office 3 Year Diversity Strategy.

- It should be possible for reasonable adjustments to be made to the way the PND is accessed to allow use by those with disabilities. For example, using enlarged text and colours that are not difficult to distinguish for individuals who are colour blind. The PND should conform to ISS4PS Style Guide Section 2.3 (v3.1) in respect of disability.
• Reasonable adjustments and other equality and diversity issues will also have to be considered in terms of delivering training to users.

• The development of a Code of Practice which should include the need for an appropriate awareness of language, terminology and sensitivity in relation to all equality and diversity issues when collecting, recording and sharing information. A Code of Practice has received ministerial approval and is being drafted for completion later in 2009.

• The development of detailed Guidance to accompany a Code of Practice. Business Rules are now being drafted for completion later in 2009.

• Ensure that equality and diversity are included within training for staff carrying out all processes and actions on the PND, and particularly, the appropriate level of treatment of sensitive and confidential information. The Programme is seeking to specifically include equality and diversity in relation to information and intelligence within the development of an Information Management Learning Programme which would apply to all users of the PND.

• Throughout the development of the PND, consideration should be given to the relevant equality, and diversity issues that may arise whilst processing data that is to be loaded onto the system.

• Each force conducts a local equality impact assessment or reviews its existing equality and diversity policies and procedures in the context of deployment of the PND within their force.

4.43 The above recommendations will be monitored throughout the duration of the development and implementation of the PND.

4.44 Actions and recommendations that are resolved will remain within the overall Equality Impact Assessment complete with an explanation of how the matter has been taken forward.

4.45 It will not be possible to produce the final Equality Impact Assessment until after completion of the Programme, as monitoring of any equality and diversity impacts will be a continuous process throughout the life span of the Programme and beyond. However, reports of the outcome of the Assessment should continue to be published at suitable points such as 2010/11 following initial deployment of the PND.

4.46 The Programme had established the principle that “How the PND operates, and how the system or data on it is used, will be non-discriminatory – i.e. compliant with the requirements of equal opportunities and diversity legislation.” In parallel with the consultation, the Programme had been considering how this might apply to each of the processes that would be enabled by the PND, or that would be needed to support its operation (see Annex C). This helped to identify a large number of detailed requirements; for each of which an assessment was made of whether they would need to be delivered through the design of the IT, through business processes or a combination of these.
Ensuring access to information

4.47 Information used in completing this Equality Impact Assessment either is or will be made available accordingly.

- Sir Michael Bichard’s reports on the findings of his inquiry, and the Government’s reports setting out the progress made on his recommendations are all public documents, available in hard copy or on the internet;
- The equality impact report will be published once completed;
- Information on the Programme is also available on the NPIA and Home Office websites;
- Responses to the consultation which took place between January and April 2008 have been published in the “Report on the Outcome of the Equality, Diversity and Privacy Consultation” available on the NPIA website;
- Responses to wider consultation and engagement are included within this document.

4.48 The NPIA Operational Services Directorate (OSD) maintains regular contact with forces, and supports Police Forces in providing training and advice to INI users. Recommendations in respect of amendments or changes to the Business Rules will be monitored to ensure inclusion.

4.49 The MoPI Implementation team also maintains regular contact with forces, and supports them in conducting capability assessments and peer reviews, which monitor progress on implementation of the MoPI requirements by forces.

4.50 The IMPACT Programme’s Regional Coordinators also act as a specific point of contact between forces and the IMPACT Programme. Regular contact with user organisations, the Regional Coordinators, and other outreach work will ensure that forces/users and stakeholders are kept informed about new developments, and are given a chance to voice any concerns.

4.51 It is intended to be as transparent as is possible about how the PND operates and is used without compromising delivery of the aims of preventing and detecting crime. The Code of Practice and accompanying Guidance will be subject to quite wide consultation. The Code of Practice and much of the Guidance will therefore be published.

4.52 Development of the requirements has involved, and continues to involve, close collaboration with the Police Service. The governance structure (in particular the Programme Board and Business Design Authority) has strong representation from the service and other stakeholders.

4.53 We expect a further report on the progress of the Bichard Inquiry recommendations will be published later this year, covering the development and implementation of the PND.

4.54 Ongoing consultation and feedback will form part of and inform the review of the Equality Impact Assessment which will take place at each key stage in the design, delivery and implementation of the PND.
4.55 The Programme will involve the NPIA’s Independent Advisory Panel to assist in monitoring the PND policy.

4.56 It is planned that the PND will provide a comprehensive auditing capability which will be both proactive and reactive, at a local through to national level. All actions logged will be subject to audit.

4.57 The Programme will be looking to review forces’ progress towards full implementation of the Code of Practice and this may be subject to HMIC scrutiny.

4.58 Whilst IMPACT will ensure that the central design, delivery and deployment of the PND is compliant with equality and diversity requirements, including such things as business rules, responsibility for how the PND and the data on it are used ultimately resides with Chief Officers and it must be for them to ensure compliance within their forces.
Chapter 5: Conclusion and Review points

5.1 The initial screening and full assessment of the Equality Impact Assessments have demonstrated that there are no fundamental equality and diversity concerns regarding the key objectives and workstreams of the IMPACT Programme. However, there are a few areas which the Programme will address over the course of the next 12 months. An action list is contained within Chapter 6.

5.2 Further work, including ongoing consultations will be carried out to ensure the potential impacts on equality and diversity are identified and fully considered in designing, implementing and using the system, and using the data obtained from it.

5.3 It is clear from the extent of consultation and the valuable content of responses so far that further consultation should be undertaken as development of the PND continues. It should be noted that those consulted offered comment and not advice.

5.4 Many of the issues raised during consultation related to privacy and these are addressed within the Programme’s Privacy Impact Assessment. However all those consulted and more particularly during the latest round of consultation expressed concerns which relate to policing in general in terms of attitudes and assumptions, for example in respect of mental health, learning disability, sexual orientation and gender. There was a clear message delivered in respect of the importance of ‘getting it right’ at first contact and when gathering information. Individual forces remain responsible for addressing these issues at a local level.

5.5 Sensitive and audience specific communication was also seen as critical in delivering explanations and information regarding the PND, to ensure understanding of the benefits of the system and reassurance in respect of use and security of the system.

5.6 Whilst some potential for a negative impact on equality was identified, those consulted saw the benefits of the PND.

5.7 An earlier review of the Report will be conducted if there is a change of policy, legislation or there are any other major developments that merit it.
# Chapter 6: IMPACT Programme Equality and Diversity Action Plan

<table>
<thead>
<tr>
<th>Action Number</th>
<th>Action</th>
<th>Review Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Make recommendations to the Management of Police Information Governance Board, regarding reviewing sections of the Guidance. To include:</td>
<td>October 2009</td>
</tr>
<tr>
<td></td>
<td>• A paragraph highlighting awareness of using equality and diversity friendly terminology / language, and demonstrating appropriate sensitivity when collecting, recording and sharing information and intelligence.</td>
<td></td>
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<tr>
<td></td>
<td>• Proposing an addendum to the Guidance outlining how to deal with legislative changes.</td>
<td></td>
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<tr>
<td>2</td>
<td>The Programme will recommend to forces that they carry out local Equality Impact Assessments or review existing equality and diversity policies and procedures prior to the implementation of the PND.</td>
<td>June 2009</td>
</tr>
<tr>
<td>3</td>
<td>Ensure that the final supplier is able to demonstrate compliance with the relevant equality and diversity legislation and that this is demonstrated within the development of the PND.</td>
<td>October 2009</td>
</tr>
<tr>
<td>4</td>
<td>Code of Practice and Business Rules for the PND are to promote equality and diversity.</td>
<td>June 2009</td>
</tr>
<tr>
<td>5</td>
<td>Training for all users of the PND to promote equality and diversity to include specific examples from consultation</td>
<td>June 2009</td>
</tr>
<tr>
<td>6</td>
<td>Further consultation with key interested agencies and stakeholders covering all 3 aspects of the Programme to ensure a wide and diverse response</td>
<td>October 2009</td>
</tr>
<tr>
<td>7</td>
<td>The IMPACT Programme continues to consider equality and diversity in all aspects of its work.</td>
<td>Ongoing</td>
</tr>
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Appendix A

DELEGATE LIST
List of attendees at the NPIA National Stakeholder Engagement Event 5 July 2009

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation/Group</th>
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<tbody>
<tr>
<td>Tom Tyler</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Maymon Nahar</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Douglas Lewins</td>
<td>Metropolitan Police Authority</td>
</tr>
<tr>
<td>Phil Booth</td>
<td>NO2ID</td>
</tr>
<tr>
<td>Liam Duncan</td>
<td>Information Commissioner’s Office</td>
</tr>
<tr>
<td>Sebastian Beine</td>
<td>Criminality Information Unit (Home Office)</td>
</tr>
<tr>
<td>Caroline Cooper</td>
<td>Victim &amp; Witness Unit (Office for Criminal Justice Reform)</td>
</tr>
<tr>
<td>Paul Bygrave</td>
<td>NPIA Equality, Diversity &amp; Human Rights Team</td>
</tr>
<tr>
<td>Chris Lester</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Ian Murdoch</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Kate Firkins</td>
<td>Data Protection Officer, West Midlands Police</td>
</tr>
<tr>
<td>Jenny Martin</td>
<td>Data Analyst, West Midlands Police</td>
</tr>
<tr>
<td>Richard Allen</td>
<td>Data Protection Officer, Lancashire Police</td>
</tr>
<tr>
<td>Robert Smith</td>
<td>NPIA IMPACT Programme – Business Rules</td>
</tr>
<tr>
<td>Kate Sale</td>
<td>Representing Youth Justice Board/ACPO Children &amp; Young Persons Business Area</td>
</tr>
<tr>
<td>Chris Morrall</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (E &amp; D Lead)</td>
</tr>
<tr>
<td>Andrew McConaghy</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (Privacy Lead)</td>
</tr>
<tr>
<td>David Stevens</td>
<td>Senior User</td>
</tr>
<tr>
<td>Dianna Yach</td>
<td>Ionann Management Consultants</td>
</tr>
<tr>
<td>Dez O’Neill</td>
<td>Ionann Management Consultants</td>
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ONE TO ONE INTERVIEWS
Interviews conducted over a 4 month period between December 2008 and March 2009 with representatives of stakeholder organisations across the public, private and third sector

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe Hurn</td>
<td>Gypsy Taveller</td>
</tr>
<tr>
<td>Name</td>
<td>Group</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>Amy Whitelock and Anna Bird</td>
<td>MIND</td>
</tr>
<tr>
<td>Owen Sharp</td>
<td>Victim Support</td>
</tr>
<tr>
<td>Tom Tyler</td>
<td>Association Police Authorities</td>
</tr>
<tr>
<td>Sam Dick</td>
<td>Stonewall</td>
</tr>
<tr>
<td>Fazil Kawani</td>
<td>Refugee Council</td>
</tr>
<tr>
<td>Dr Catherine Stone</td>
<td>Voice UK</td>
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</tbody>
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**COMMUNITY GROUP CONSULTATION**
Conducted over a 3 month period between December 2008 and February 2009

<table>
<thead>
<tr>
<th>Contact</th>
<th>Group</th>
</tr>
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<tbody>
<tr>
<td>Sarah Chadwick</td>
<td>Toton Methodist Group</td>
</tr>
<tr>
<td>Nicholas Pomphrey</td>
<td>NACRO</td>
</tr>
<tr>
<td>PC Chris Hayton and Insp Lesley Mansell – Leicestershire Police</td>
<td>Loughborough Hate Crime Panel</td>
</tr>
<tr>
<td>Alan Sivori – Greater Manchester Police</td>
<td>Local Muslim Community</td>
</tr>
<tr>
<td>Abida Niaz – Community Relations Officer</td>
<td>Crescent Community Radio Station (interview and on line questionnaire)</td>
</tr>
<tr>
<td>Insp Fran Jones</td>
<td>Cambridge Police Independent Advisory Group and Police Authority Members</td>
</tr>
<tr>
<td>Everett Henry</td>
<td>NPIA Independent Advisory Panel</td>
</tr>
</tbody>
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Annex A: The Bichard Recommendations

Recommendation 1

A national IT system for England and Wales to support police intelligence should be introduced as a matter of urgency. The Home Office should take the lead and report by December 2004 with clear targets for implementation.

Recommendation 2

The PLX system, which flags that intelligence is held about someone by particular forces, should be introduced in England and Wales by 2005.

Recommendation 4

Investment should be made available by Government to secure the PNC’s medium and long-term future, given its importance to intelligence-led policing and to the criminal justice system as a whole. I note that PITO has begun this work.

Recommendation 8

A Code of Practice should be produced covering record creation, review, retention, deletion and information sharing. This should be made under the Police Reform Act 2002 and needs to be clear, concise and practical. It should supersede existing guidance.

Recommendation 9

The Code of Practice must clearly set out the key principles of good information management (capture, review, retention, deletion and sharing), having regard to policing purposes, the rights of the individual and the law.

Recommendation 10

The Code of Practice must set out the standards to be met in terms of systems (including IT) accountability, training, resources and audit. These standards should be capable of monitoring both within forces and by HMIC and should fit within the Police Performance Assessment Framework.

Recommendation 11

The Code of Practice should have particular regard to the factors to be considered when reviewing the retention or deletion of intelligence in cases of sexual offences.
Annex B: The three main IMPACT work strands

1. Management of Police Information

Background

1.1 A Code of Practice on the Management of Police Information (MoPI) was introduced in Parliament in July 2005 by the [then] Home Secretary under the terms of the Police Act 1996. The Code came into effect in England and Wales in November 2005.

1.2 The Code of Practice requires that 'Chief Officers of police must ... ensure that their forces adopt practices for the management of information that ensure such information is used effectively for police purposes and in compliance with the law.'

1.3 Under the terms of the 1996 Act, Chief Officers must have due regard to the Code of Practice and Guidance.

1.4 The Code describes police purposes as:
- protecting life and property;
- preserving order;
- preventing the commission of offences;
- bringing offenders to justice; and
- any duty or responsibility arising from common or statute law.

1.5 More detailed operational Guidance was developed by the National Centre for Policing Excellence on behalf of the Association of Chief Police Officers (ACPO) and the Home Office. This was published in April 2006.

1.6 Together, the Guidance and the Code of Practice form a framework for improved and more consistent information management processes to be adopted across all forces. These underpin the rest of the IMPACT Programme's work.

1.7 The Guidance is divided into sections that cover all the stages in the management of police information:
- collection;
- recording;
- evaluation and actioning;
- sharing; and
- review, retention and disposal.

Work to date

1.8 Whilst the Home Secretary and ACPO were responsible for developing the MoPI Code of Practice and Guidance, the IMPACT Programme is supporting forces in implementing their requirements.

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4 Code of Practice on the Management of Police Information Section 1.1.3 (attached as an annex to the MoPI Guidance, which is available at http://www.crimereduction.gov.uk/policing21.htm)
1.9 Following a comprehensive assessment of the capability of forces to implement the MoPI requirements, carried out during 2006, the Project Board that is overseeing implementation set forces a target of achieving full compliance across all their business areas by 2010.

1.10 To date, three sets of peer reviews have been undertaken. These have shown that good progress is being made, but there remain some significant challenges to be overcome in achieving full compliance across all forces.

1.11 A fourth set of reviews is ongoing. These are generic independent assessments of progress towards compliance with Force Action Plans. They are designed to highlight areas of excellence and address shortfalls that could be rectified through the exchange of good practice.

1.12 The anticipated positive impacts of the implementation of the Code of Practice and the Guidance within the Police Service are as follows:

- improved quality of policing information;
- better management of policing information;
- more robust information and less unnecessary duplication;
- greater consistency in the management of police information; and
- increased public confidence in the Police Service.
2. The IMPACT Nominal Index

Background

2.1 The IMPACT Nominal Index (INI) is an index of names that already appear in police operational records. It enables authorised users in one force or other policing agency to quickly establish which forces / agencies hold information in one or more of their local systems on a named individual who is of interest in connection with their policing responsibilities. The local systems covered by the INI contain information from 6 key policing areas: intelligence, crime, custody, child protection, domestic violence, and firearms licence refusals and revocations.

2.2 There are over 270 local systems containing such information. Before the INI was introduced, other forces and, in some cases, even other business areas within the same force could be unaware that information was held in other parts of the Police Service that could be extremely valuable to them.

2.3 The information that is available on the INI regarding an individual is:
   - family name;
   - family name verification – indicates whether the family name is an alias, current, birth or other;
   - forenames;
   - gender – female, male or unknown;
   - date of birth;
   - place of birth; and
   - the force and local system in which information is held.

Information on race, belief, gender identity, sexual orientation and disability is not held on the INI system.

2.4 INI is only accessible to authorised users and rules are in place to control the use of the information.

2.5 Forces / agencies contributing information to the INI have been instructed only to send information relating to suspects and offenders. They have been told not to send information on victims and witnesses.

2.6 The information is shared with other policing or law enforcement agencies solely for policing purposes such as preventing crime and bringing offenders to justice. Use of the system is subject to detailed business rules and the use of the system is fully auditable – i.e. information is kept on who conducted each search, when, what search criteria were used, on whose behalf the search was carried out, the reason for the search, and the results obtained.

2.7 The INI does not provide access to the records themselves; users must contact the forces owning the records to request further details or copies.

2.8 Although the INI was developed primarily to support child protection work, it is also being used in support of other operational policing areas including investigations into serious and organised crime, counter terrorism activities and employment vetting.
2.9 The INI has now been deployed to all Scottish forces, the Police Service of Northern Ireland, the British Transport Police, the Service Police Crime Bureau (part of the Royal Military Police), the Ministry of Defence Police and Guarding Agency, the Civic Nuclear Constabulary (CNC), the Serious and Organised Crime Agency (SOCA) and the UK Human Trafficking Centre. Work is underway to enable deployment to:

- Guernsey, Jersey and the Isle of Man Police;
- Border and Immigration Agency; and
- Her Majesty’s Revenue & Customs.

2.10 These organisations will not only have access to the data on the INI, most will also load information about their records onto the system.

2.11 Other than relevant policing agencies, such as Regional Intelligence Units, there are no plans at this stage to roll out the INI further, although operational needs are constantly under review.

2.12 When the INI was first deployed, it contained around 23 million records. Even with some de-duplication, this had increased to around 62 million by the end of March 2008 when responsibility for the system was transferred to the NPIA Operational Services Directorate. By the end of March 2009 this had increased again to 69 million. As well as supporting decision making within forces and other enforcement agencies, this is also helping to strengthen the Disclosure Service and vetting process managed by the Criminal Records Bureau (CRB). The CRB has access to the same information via its interim Police Local Cross-Check (i-PLX) system.

2.13 Over the 12 months from April 2007, use of the INI tripled with around 36,000 searches being conducted in March 2008. By the end of November 2008 874,470 search and find enquiries had been carried out since implementation. March 2009 had the highest number of search and find enquiries carried out in one month with 78,912 carried out.

2.14 An estimated 11% of searches have resulted in requests to other forces for access to information they hold.

2.15 The INI is an interim system that will be in use until the capabilities that it provides are superceded by the Police National Database (PND).
3. **The Police National Database (PND)**

**Background**

3.1 The Police National Database (PND) will provide an extensive store of police intelligence and other operational information, containing and linking locally held data with data currently held on the Police National Computer (PNC) and other national systems. In doing so, it will not only address the Government’s commitment to implement Sir Michael Bichard’s first and fourth recommendations (a national IT system to support police intelligence and securing the long term future of the PNC), it will also provide much wider benefits to the Police Service.

3.2 Unlike the INI which only contains an index of information on people, the PND will hold more detailed information on people (e.g. names, including organisations), objects (e.g. cars), locations (e.g. addresses) and events (e.g. crime reports).

3.3 We have been working closely with the Police Service and other stakeholders to establish and clarify their requirements. As an ongoing project, the exact details of what the system will do, and how it will do it, have yet to be finalised. However, the requirements can be grouped as follows:

- Data Upload and Entry;
- Search and Retrieve;
- Security and Audit;
- Communication;
- Review, Retention and Disposal; and
- System Administration.

3.4 **Data Upload and Entry** will allow forces to share copies of information that they hold on their local systems with each other and also to enter information onto the PND directly. As well as text, it will be possible to share images, files, maps, video and audio. Users will also be able to create links between records, including where the records belong to different forces.

3.5 Chief Officers will be owners (and data controllers) for the information loaded onto the PND or created on the system by their staff. This will mean that Chief Officers will continue to be responsible for the data, including any links made with other information.

3.6 We are planning interfaces with other police systems and also with external systems which are routinely used by the police, such as the Driver and Vehicle Licensing Authority database.

3.7 **Search and Retrieval** will allow users to find and view information on the PND. The capabilities will range from simple, structured searches (which would allow a user to find, for example, all records about a particular individual, vehicle etc.) to free text searches (which would allow wider searches for information on the system).

3.8 The PND will help to identify links with other information – e.g. Alan Smith lives at a particular address in Essex and is the keeper of vehicle XYZ 123; this vehicle is also linked with an address in Hampshire.
3.9 It will be possible to transfer data from the PND to other systems that forces use to carry out more sophisticated analyses.

3.10 Security and Audit will help to ensure that the information is kept safe. Only authorised users will be permitted to access the system and they will only be able to view the information that they need. So, for example, access to information about child protection may be restricted to those police staff involved in child protection work.

3.11 As with the INI, all user activity on the PND will be auditable; the details of all transactions on the system and the results generated by those actions will be logged and subject to audit by force or other designated auditors.

3.12 The Communication capabilities will be used for a number of purposes, ranging from very urgent messages (e.g. a terrorist threat) to routine data quality issues (e.g. signalling potential duplicate or incorrect records). “Flags” and “markers” can also be added to records, which will allow users to do such things as provide additional information about a record or register an interest in a record so that they can be notified of any activity relating to it.

3.13 The Review, Retention and Disposal functions will, in accordance with the MoPI requirements, allow forces to re-examine the information they hold, to decide whether they need to retain it and, if not, to dispose of it.

3.14 The PND will introduce further complexities to the RRD process. For example, how decisions by one force to dispose of one of its records might affect another force which still needs the information it contains. Decisions about whether to dispose of information may also be affected by information held by another force.

3.15 The PND needs to be flexible to support the variations between forces in policing practice and to adapt to changing policing priorities. To support this flexibility, the PND will be rule-driven with the function allowing these rules to be set and amended as necessary.

3.16 This function will also allow administrators within each force to manage who within their force can access the system and what they are authorised to do whilst using it.

3.17 Sharing personal information on the PND is subject to the requirements of a range of legislation particularly the Data Protection Act 1998, the Human Rights Act 1998 and the various equality and diversity acts. Other legal requirements, such as the common law duty of confidentiality, will also apply.

3.18 The Programme is considering not just how the requirements of these Acts can be met but also how the impact on individuals’ privacy can be kept to the minimum necessary for achieving the key policing aims of preventing and detecting crime. This will form part of the work we are doing to complete a Privacy Impact Assessment – something that the Information Commissioner has recently recommended for new initiatives dealing with personal data. The public consultation was an important part of all this work.

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5 See [http://www.ico.gov.uk](http://www.ico.gov.uk)
3.19 The Programme has recently awarded a contract to Logica for the design, build, delivery and operation of Phase 1 of the PND. The contract is effective from the 1st April 2009. Delivery of Phase 1 will commence in 2010.

3.20 The PND will deliver substantial direct and indirect benefits. Direct benefits will be delivered through improvements in the capture, accessibility and sharing of information within and between forces. These include: efficiency and time savings; quality improvements; and access to better and more comprehensive information. Indirect benefits will result from decisions and actions that exploit the direct benefits to secure outcomes such as the prevention or detection of crimes.
Annex C: PND processes

Identity and Access Management
The Identity and Access Management processes cover access to the system by authorised users. It comprises the following: (1) the setting up and management of user accounts; (2) rules governing access to the PND as a whole; and (3) rules governing access to individual data sets and functionality (e.g. role based access).

Load / store
The Load / store processes comprise the following: (1) extraction of data from local systems by stakeholders, validation and transformation of extracted data, again by stakeholders, and transport by stakeholders to the PND – these are primarily the responsibility of the data providers; (2) ongoing loading, storage and validation of data on the PND; and (3) the ongoing process of creating, reviewing, updating, amending, weeding and deleting data on the PND.

Search
The Search processes comprise the interrogation and retrieval of data from the PND, and the facility to read, download, save and, in some cases, extract and export the results of searches.

Associate
The Associate processes will identify related or connected information within the PND, and will store data about those relationships or connections.

Flags / Markers
These processes will enable flags and markers to be added to data items. Flags enable information to be received back (such as when someone accesses or changes that information); markers allow additional information to be provided.

Data use
Data use comprises the rules about what users are entitled to do with data obtained from the PND, any steps which must be taken before acting on that information and prohibitions on use which may apply to specific categories of data.

Audit
The Audit processes comprise the logging of user activity and the audit / monitoring of user activity.

Dealing with Subject Access Requests (SARs), FOI requests etc
This comprises the processing of requests by data subjects, or others, for information held on the PND, and dealing with the other rights of data subjects under the Data Protection Act such as to prevent processing likely to cause substantial harm or distress and to have inaccurate information rectified, blocked, erased or destroyed.
Management Information

This comprises the processes of examining and reporting on the operation of the PND.
Supporting Documents:

Initial Equality Impact Assessments
## POLICY AIMS, OBJECTIVES & PROJECTED OUTCOMES

The IMPACT Programme within the National Policing Improvement Agency (NPIA) will deliver an effective integrated national, regional and local information-sharing and intelligence capability, which will improve the ability of the police and partner agencies to proactively use information for intelligence purposes to prevent crime, bring offenders to justice, safeguard children and vulnerable persons and further professionalise the investigation process.

The IMPACT Programme will improve police data management through an incremental programme of business change. In doing so the Programme will be delivering 7 of the recommendations made by Sir Michael Bichard following his inquiry into the Soham murders.

Four of Sir Michael’s recommendations (recommendations 8-11) related to introducing a Code of Practice on the Management of Police Information (MoPI). The MoPI Code is a statutory code and was made by the Home Secretary in July 2005, coming into effect on 14 November that year. Chief Officers must have ‘due regard’ to the Code of Practice.

To accompany the Code, more detailed Guidance was produced by the then National Centre for Policing Excellence on behalf of the Association for Chief Officers. The Guidance was published on 1st April 2006.

The Code and Guidance together provide a framework for the efficient management of police data. They set minimum standards for the management of police information that all forces must meet. The Code and Guidance apply to England and Wales.

The IMPACT Programme is only responsible for supporting forces in implementing...
MoPI and this Equality Impact Assessment (EIA) will focus on that work.

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<thead>
<tr>
<th>Question</th>
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<tbody>
<tr>
<td>Will the policy have an impact on national or local people/staff?</td>
<td>Yes - As MoPI covers all aspects of the management of information (collecting; recording; evaluation and actioning; sharing; and review, retention and disposal) it will impact directly on police officers and staff across England and Wales. It could also have an indirect impact on the subjects of the information (suspects, offenders, victims, witnesses etc.) and on the public more generally in terms of making communities safer by improving the Police Service’s ability to prevent and detect crime.</td>
</tr>
<tr>
<td>Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy?</td>
<td>No - particular groups (such as BMEs) may have different experiences and attitudes to the police and the information and intelligence that they collate. Similarly, given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. However, the key objective of the MoPI Code of Practice and the Guidance is to ensure that information is managed more effectively and consistently and in line with the requirements of the Data Protection Act 1998 and the Human Rights Act 1998.</td>
</tr>
<tr>
<td>Are there any aspects of the policy that could contribute to equality or inequality?</td>
<td>No - the Code of Practice and the Guidance apply equally to managing all types of information, and not information relating specifically to any communities or groups.</td>
</tr>
<tr>
<td>Could the aims of the policy be in conflict with equal opportunity, elimination of discrimination, promotion of good relations?</td>
<td>No - the aims of the policy are to ensure an effective and consistent approach to the management of police information and do not conflict with equal opportunity, the elimination of discrimination, or the promotion of good relations.</td>
</tr>
<tr>
<td>If this is an amendment of an existing policy, was the original policy impact assessed?</td>
<td>No - this is not an amendment of an existing policy; it is the implementation of an existing policy. The MoPI Code of Practice and the Guidance were both subject to legal, diversity, and Human Rights screening processes. The IMPACT Programme does not own the MoPI Code or Guidance; it is solely supporting the Police Service in implementing the requirements.</td>
</tr>
</tbody>
</table>

If your answer to any of these questions is **YES, go on to the full EIA.**
If you have answered **NO to any particular questions**, please provide explanatory evidence.
If you have answered **NO to all of these questions** then you must also attach the following statement to all future submissions that are related to this policy and ensure it is signed off by senior management. You must also include this statement within any regulatory impact assessment that is related to this policy.

“**This policy was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. As a result of this screening, it has been decided that a full equality impact assessment is not required.** “
FULL EQUALITY IMPACT ASSESSMENT

<table>
<thead>
<tr>
<th>Date of assessment</th>
<th>10 August 2007 – March 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Policy Writer</td>
<td>Director General Peter Neyroud</td>
</tr>
</tbody>
</table>

STATISTICS & RESEARCH

What relevant quantitative & qualitative data do you have in relation to this policy?

Please site any quantitative (e.g. statistical research) and qualitative evidence (monitoring data, complaints, satisfaction surveys, focus groups, questionnaires, meetings, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy area.

<table>
<thead>
<tr>
<th>Equality Target Areas</th>
<th>How does the data identify potential or known positive impacts?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>How does the data identify any potential or known adverse impacts?</td>
</tr>
<tr>
<td>(consider e.g. nationalities, Gypsies, Travellers, languages)</td>
<td>The need for the Police Service to improve the way that it managed its information was identified by Sir Michael Bichard’s inquiry into the Soham murders. The Code of Practice was subject to a full public consultation between December 2004 and February 2005.</td>
</tr>
<tr>
<td>Disability</td>
<td>Consultation on the Code and Guidance targeted a range of organisations and stakeholders, including Liberty, police staff associations, Government departments, unions, Victim Support, child protection charities and the wider law enforcement community.</td>
</tr>
<tr>
<td>(consider social access and physical access)</td>
<td>This consultation was considered sufficient to ensure that any issues around equality were identified, but no specific issues arose regarding equality.</td>
</tr>
<tr>
<td>Gender</td>
<td>Implementation of MoPI is not currently expected to raise any new equality issues. However, this will continue to be monitored as implementation progresses.</td>
</tr>
<tr>
<td>Gender Identity</td>
<td>Positive impacts of the implementation of the Code of Practice and the Guidance within the Police Service are as follows:</td>
</tr>
<tr>
<td>Religious and Belief</td>
<td>• Improved policing information;</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>• Better management of police information;</td>
</tr>
<tr>
<td>Age</td>
<td>• More robust information;</td>
</tr>
<tr>
<td></td>
<td>• Greater consistency nationally with regard to the management of information; and</td>
</tr>
<tr>
<td></td>
<td>• Increased public confidence in the Police Service. The positive impacts are identified as the key benefits of MoPI.</td>
</tr>
</tbody>
</table>
There is no quantitative data available with regard to the impact of MoPI on equality issues.

**What research have you considered commissioning to fill any data gaps?**

For example, you may need to ensure quantitative & qualitative data groups include stakeholders with respect to this policy.

N.B Include any recommendations in your action plan

To help with implementation of MoPI, forces have been consulted in a number of ways:

- Capability Assessment
- Force visits
- Regional Workshops
- National Seminars
- Peer Reviews

The Programme is also helping forces produce, and review, action plans for implementing MoPI. Whilst none of these are directed at equality issues, it was likely that, if any such issues had been identified by forces, they would have been raised in the reviews.

The situation will continue to be monitored as implementation progresses, with more specific attention paid to any equality issues (see recommendations).

A public consultation exercise was conducted early in 2008 and the responses published in an Outcome Report available on the NPIA Website (further details provided later in this document).

Establishing a breakdown of the records held by the Police Service and how they are managed by gender, age, race, disability, gender identity, religion / belief / non belief or sexual orientation could only be completed at disproportionate cost.

---

**Who are the stakeholders, community groups, staff or customers for this policy area?**

Ministers and colleagues in Home Office, Ministry of Justice and other departments / agencies
Bichard Strategic Implementation Programme
Chief Officers / Association of Chief Police Officers
Police Authorities / Association of Police Authorities
Police officers and police staff
Police Staff Associations and Support Organisations
Other parts of the National Policing Improvement Agency
Other law enforcement agencies
Information Commissioner’s Office

Those who are the subject of, or otherwise named in, police records (offenders, suspects, victims, witnesses and potential victims)
The wider public
What are the overall trends and patterns in this qualitative & quantitative data?

Few equality issues have been raised at this stage so it is not possible to identify any trends or patterns.

Please list the specific equality issues that may need to be addressed through consultation (and further research)?

Neither MoPI itself nor the work of the Programme in supporting the implementation of MoPI raise any specific issues that need consultation or research. However, MoPI was covered in an IMPACT Programme wide public consultation on equality, diversity and privacy. Details of this are provided later in this assessment.

GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

INTERNAL STAKEHOLDER ENGAGEMENT: Consulting & involving Other Government Departments, Staff, Agencies & NDPBs

<table>
<thead>
<tr>
<th>Does this policy affect the experiences of staff? How? What are their concerns?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Staff</strong></td>
</tr>
<tr>
<td><strong>Staff Networks &amp; Associations</strong></td>
</tr>
<tr>
<td><strong>Trade Unions</strong></td>
</tr>
</tbody>
</table>

How have you consulted, engaged and involved internal stakeholders in considering the impact of this proposal on other public policies and services?
For example your policy may affect access to housing, education, health, employment services.
This policy should have no equality impact on other public policies and services. The Police Service and other internal and external stakeholders were extensively consulted as part of the Bichard Inquiry and in producing the Code of Practice and Guidance.

Various interested parties (such as ACPO, APA and the Ministry of Justice) are represented on the IMPACT Programme Board and Business Design Authority, and on the Bichard Strategic Implementation Programme Board which co-ordinates delivery of the Bichard recommendations.

Regular reports (initially 6 monthly) have been produced and published on progress on the Bichard Recommendations. These are cleared with Ministers in interested Departments.

In addition, there is a quarterly Regional Coordinators meeting at which the concerns and queries of forces are discussed.

The Code of Practice and Guidance were the subject of widespread consultation. Implementation issues have been considered as part of force capability reviews and peer reviews.

MoPI coordinators on the Programme visit forces regularly.

A public consultation exercise in respect of Equality, Diversity and Privacy was conducted by the IMPACT Programme between January and April 2008. The consultation was sent directly to 47 organisations, and to all 43 police forces in England and Wales. There were also 800 unique visits to the consultation document on the NPIA website. A total of 17 responses were received to the consultation, mainly from police forces, police authorities or police related associations.

What positive and adverse impacts were identified by your internal consultees? Did they provide any examples?

The equality issues raised about MoPI during the consultation were:

- The terminology and language that may be used within records and that could disadvantage an individual if not properly considered prior to the sharing of those records
- The need to ensure that information on an individual’s sexual orientation only be collected and shared where the reasons for doing so are fair and proportionate

The Programme recognises these concerns, and the wider issues regarding the collection and sharing of information relating to other equality and diversity strands, for example, race, religion or belief, or disability. However, this information may, in certain circumstances, need to be collected to support public protection or other policing purposes.

Such issues should already be addressed by forces’ own policies and arrangements for supporting equality and diversity. However, a paragraph will be introduced into the Guidance, when it is next revised, which highlights the need for an appropriate awareness of language, terminology and sensitivity in relation to all equality and diversity issues when collecting, recording, reviewing and sharing information. Advice will be issued to forces in the interim.

A question was raised in respect of the effect of amendments to legislation and how these were handled: for example, how information on individuals who were
previously suspected of being involved in an activity that had been an offence prior to the legislative change. In particular, the response queried the handling of records relating to homosexual activity involving individuals aged between 16 and 21, which took place prior to the enactment of the Sexual Offences Act 2003 when it would have been an offence.

The MoPI Guidance does outline how to deal with records when an offence is re-categorised under the law to carry a greater sentence. However, the Programme is considering how the other effects of changing legislation could best be managed. The Programme acknowledges this current lack of clarity and will ensure that appropriate guidance is included in the next revision of the MoPI Guidance. Advice will be issued to forces in the interim.

Feedback the results of this internal consultation and use it as a basis for work on external consultation

EXTERNAL CONSULTATION & INVOLVEMENT

How did your engagement exercise highlight positive and negative impacts on different communities?

<table>
<thead>
<tr>
<th>Voluntary Organisations</th>
<th>A wide range of force and non-force stakeholders were involved in the Bichard Inquiry and the consultation of the Code and Guidance. None identified any equality issues.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>As mentioned above, the equality, diversity and privacy consultation was sent to 47 other agencies as well as the 43 England and Wales police forces. These included a range of police support and staff agencies, but also external organisations such as the Equalities and Human Rights Commission and bodies representing a range of different groups. The response from external consultees was notably limited and no equality issues regarding MoPI were identified by external consultees.</td>
</tr>
<tr>
<td>Faith</td>
<td></td>
</tr>
<tr>
<td>Disability Rights</td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Gender Identity</td>
<td></td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>A copy of the report describing the outcome of the consultation was sent to all consultees whether they responded or not.</td>
</tr>
<tr>
<td>Age</td>
<td>Following the limited response from the aforementioned consultation, wider consultation was conducted using various methods to ensure as wide a range of views as possible. This was completed through one to one interviews with representatives of both public and third sector agencies and organisations, engaging with local community groups, radio interview, and national stakeholder workshop (full list of consultees at Appendix B). The majority of responses and issues raised related to privacy and these are dealt with in a separate Privacy Impact Assessment.</td>
</tr>
</tbody>
</table>
Feedback the results of your community engagement (i.e. involvement and consultation) to all participants including internal and external stakeholders

**ASSESSMENT & ANALYSIS**

<table>
<thead>
<tr>
<th>Does the EIA show a potential for differential impact on any group(s) if this proposal is introduced? If Yes, state briefly whether impact is adverse or positive and in what equality areas.</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. Given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. However, implementation of MoPI should improve the effectiveness and consistency with which information is managed. The issues raised in the consultation existed prior to and not as a result of the introduction of MoPI.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What were the main findings of the engagement exercises and what weight should they carry?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The main findings of the consultation to date relate to the following;</td>
</tr>
<tr>
<td>• Language and terminology</td>
</tr>
<tr>
<td>• The implications of changes to legislation</td>
</tr>
<tr>
<td>The responses to these findings are included within the recommendations and the Equality Impact Action Plan (see recommendations).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Code of Practice and the Guidance do not have the potential to cause unlawful direct or indirect discrimination. Chief Officers must have ‘due regard’ to the Code of Practice and therefore to the Guidance, both of which are underpinned by the Data Protection Act 1998 and the Human Rights Act 1998. Participation in aspects of public life will not be limited by the policy; neither will specific groups be limited from obtaining services.</td>
</tr>
<tr>
<td>There are various channels that members of the public and staff can bring concerns/complaints in relation to discrimination:</td>
</tr>
<tr>
<td>• Chief Constable/Police Authority Chair</td>
</tr>
<tr>
<td>• Diversity staff associations e.g. BAWP, GPA, Unison, Federation</td>
</tr>
<tr>
<td>• The Equalities and Human Rights Commission</td>
</tr>
<tr>
<td>• The Information Commissioner</td>
</tr>
<tr>
<td>• Their local MP</td>
</tr>
<tr>
<td>• Local voluntary organisations such as law centres, race equality councils and other campaign groups can also help and guide members of the public in relation to police complaints.</td>
</tr>
</tbody>
</table>
### How does the policy promote equality of opportunity?

MoPI is simply improving the effectiveness and consistency with which the Police Service manages information and how it abides by the requirements of the Data Protection and Human Rights Acts.

---

### How does your policy promote good relations? How does this policy make it possible for different groups to work together, build bridges between parallel communities, or remove barriers that isolate groups and individuals from engaging in civic society more generally?

The MoPI Code of Practice and Guidance will promote consistency in the management of police information in England and Wales. This will assist both within and between forces and will have benefits for the public in general, helping to better prevent and detect crime and safeguard vulnerable people. It will ensure transparency and increase public confidence in the police.

By raising the issue of the terminology etc. used in police records, it should also help to ensure that inappropriate language is not used which could support stereotyping and otherwise damage community relations.

---

### How can the policy be revised, or additional measures taken, in order for the policy to achieve its aims without risking any adverse impact?

Recommendations for improving future MoPI work are as follows:

- The MoPI Governance Board consider the inclusion of an explanatory paragraph within the Guidance regarding handling amendments to legislation, and that an addendum to the current Guidance is issued in the more immediate future. (This has now been agreed)

- Ensure that any review of the MoPI Guidance explicitly considers whether equality and the promotion of good relations need to be specifically covered. (This has now been agreed)

- Any review of the MoPI Guidance should explicitly consider the introduction of a paragraph highlighting the need for an awareness of language, terminology, and sensitivity with regard to all equality and diversity issues when collating and sharing information. (This has now been agreed)

- The review of the Force Action Plans should encourage forces to take equality into consideration when implementing MoPI. (This has now been agreed)

- Future peer reviews, workshops etc. to specifically consider equality impact issues. The 2nd set of Joining Up Workshops held in July 2008 included this as a first step.

- Ensure that the Regional Co-ordinators remain fully aware of equality issues and that they promote equality as part of their work with forces. This has and remains ongoing.

---

### Are there any concerns from data gathering, consultation and analysis that have not been taken on board?

Please justify and explain the reason for your decision.
All concerns raised to date have been assessed, and recommendations for appropriate action directed to the relevant business area within the Programme. Peer Reviews and other outreach work will ensure that forces/users and stakeholders are kept informed about and consulted on new developments, and are given a chance to voice any concerns on equality.

Concerns raised relating more specifically to RRD, security, and disclosure have been directed to and are being addressed within the Privacy Impact Assessment. In addition, regular contact with forces, including through the Regional Coordinators and other outreach work, will ensure that they are kept informed about new developments, and are given a chance to voice any concerns including on equality.

ENSURING ACCESS TO INFORMATION

**How can you ensure that information used for this EIA is readily available in the future?**
(N.B. You will need to include this in your action plan)

- Sir Michael Bichard’s reports on the findings of his inquiry, and the Government’s reports setting out the progress made on his recommendations are all public documents, available in hard copy or on the internet.
- The MoPI Guidance, with a copy of the Code of Practice appended, is also a public document, available in hard copy or on the internet.
- The equality impact report will be published once completed.
- Information on the Programme is also available on the NPIA and Home Office websites.
- Responses to the public consultation exercise have been published in the “Report on the Outcome of the Equality, Diversity and Privacy Consultation” available the NPIA Website

**How will you ensure your stakeholders continue to be involved / engaged in shaping the development / delivery of this policy?**
(N.B. You will need to include this in your action plan)

The MoPI Implementation team maintains regular contact with police forces, and supports them in conducting capability assessments and peer reviews. The IMPACT Programme’s Regional Coordinators also act as a specific point of contact between forces and the Programme.

This EIA will be reviewed at set periods. Community and stakeholder engagement will continue to inform the Assessment, identify and address as appropriate any positive or negative impacts arising.

**How will you monitor this policy to ensure that the policy delivers the equality commitments required?**
(N.B. You will need to include this in your action plan)
Peer Reviews monitor progress on implementation of the MoPI requirements by forces. These, and other outreach work, also ensure that forces/users and stakeholders are kept informed about new developments, and are given a chance to voice any concerns.

**Now submit your EIA and related evidence for clearance.**
APPENDIX A

Police Organisations:
Association of Chief Police Officers
Association of Police Authorities
Her Majesty’s Inspectorate of Constabulary

Police Staff Associations:
Police Federation
The Police Superintendents’ Association

Police Support Organisations:
British Association of Women Police
Christian Police Association
Gay Police Association
National Association of Muslim Police
National Black Police Association
National Disabled Police Association

Government Departments and Agencies:
Criminal Cases Review Commission
Home Office (Home Office Disability Network)
Ministry of Justice

Other interested individuals, groups or organisations:
Age Concern
Blink
Commission for Equality and Human Rights
Crime Concern
East London Black Women’s Organisation
Employers’ Forum on Age
Employers’ Forum on Disability
Employment Opportunities for People with Disabilities

GLADD
Help the Aged
Information Commissioner
Liberty
Mind
Muslim Council of Britain
NACRO
National Youth Agency
Newham Asian Women’s Project
No2ID
RADAR
Refugee Council
RNIB
Skills for Justice
Stonewall
The Gender Trust
The Interfaith Network for the UK
The UK Intersex Association
Trident Independent Advisory Group
UK Youth
UK Youth Parliament
Unison
Victim Support
Women and Equality Unit
Youth Justice Board
Appendix B

DELEGATE LIST
List of attendees at the NPIA National Stakeholder Engagement Event 5 July 2009

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation/Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tom Tyler</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Maymon Nahar</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Douglas Lewins</td>
<td>Metropolitan Police Authority</td>
</tr>
<tr>
<td>Phil Booth</td>
<td>NO2ID</td>
</tr>
<tr>
<td>Liam Duncan</td>
<td>Information Commissioner's Office</td>
</tr>
<tr>
<td>Sebastian Beine</td>
<td>Criminality Information Unit (Home Office)</td>
</tr>
<tr>
<td>Caroline Cooper</td>
<td>Victim &amp; Witness Unit (Office for Criminal Justice Reform)</td>
</tr>
<tr>
<td>Paul Bygrave</td>
<td>NPIA Equality, Diversity &amp; Human Rights Team</td>
</tr>
<tr>
<td>Chris Lester</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Ian Murdoch</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Kate Firkins</td>
<td>Data Protection Officer, West Midlands Police</td>
</tr>
<tr>
<td>Jenny Martin</td>
<td>Data Analyst, West Midlands Police</td>
</tr>
<tr>
<td>Richard Allen</td>
<td>Data Protection Officer, Lancashire Police</td>
</tr>
<tr>
<td>Robert Smith</td>
<td>NPIA IMPACT Programme – Business Rules</td>
</tr>
<tr>
<td>Kate Sale</td>
<td>Representing Youth Justice Board/ACPO Children &amp; Young Persons Business Area</td>
</tr>
<tr>
<td>Chris Morrall</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (E &amp; D Lead)</td>
</tr>
<tr>
<td>Andrew McConaghy</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (Privacy Lead)</td>
</tr>
<tr>
<td>David Stevens</td>
<td>Senior User</td>
</tr>
<tr>
<td>Dianna Yach</td>
<td>Ionann Management Consultants</td>
</tr>
<tr>
<td>Dez O’Neill</td>
<td>Ionann Management Consultants</td>
</tr>
</tbody>
</table>

ONE TO ONE INTERVIEWS
Interviews conducted over a 4 month period between December 2008 and March 2009 with representatives of stakeholder organisations across the public, private and third sector

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation/Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe Hurn</td>
<td>Gypsy Taveller</td>
</tr>
<tr>
<td>Amy Whitelock and Anna</td>
<td>MIND</td>
</tr>
</tbody>
</table>
**Bird**

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owen Sharp</td>
<td>Victim Support</td>
</tr>
<tr>
<td>Tom Tyler</td>
<td>Association Police Authorities</td>
</tr>
<tr>
<td>Sam Dick</td>
<td>Stonewall</td>
</tr>
<tr>
<td>Fazil Kawani</td>
<td>Refugee Council</td>
</tr>
<tr>
<td>Dr Catherine Stone</td>
<td>Voice UK</td>
</tr>
</tbody>
</table>

**COMMUNITY GROUP CONSULTATION**

Conducted over a 3 month period between December 2008 and February 2009

<table>
<thead>
<tr>
<th>Name</th>
<th>Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Chadwick</td>
<td>Toton Methodist Group</td>
</tr>
<tr>
<td>Nicholas Pomphrey</td>
<td>NACRO</td>
</tr>
<tr>
<td>PC Chris Hayton and Insp Lesley Mansell – Leicestershire Police</td>
<td>Loughborough Hate Crime Panel</td>
</tr>
<tr>
<td>Alan Sivori – Greater Manchester Police</td>
<td>Local Muslim Community</td>
</tr>
<tr>
<td>Abida Niaz – Community Relations Officer</td>
<td>Crescent Community Radio Station (interview and on line questionnaire)</td>
</tr>
<tr>
<td>Insp Fran Jones</td>
<td>Cambridge Police Independent Advisory Group and Police Authority Members</td>
</tr>
<tr>
<td>Everett Henry</td>
<td>NPIA Independent Advisory Panel</td>
</tr>
</tbody>
</table>
**Supporting Documents – IMPACT Nominal Index EIA**

**APPENDIX 2**

**EQUALITY IMPACT ASSESSMENT**

<table>
<thead>
<tr>
<th>National Policing Improvement Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMPACT Programme</td>
</tr>
</tbody>
</table>

**PRELIMINARY SCREENING**

<table>
<thead>
<tr>
<th>Date of Screening</th>
<th>23 July – 10 August 2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Policy Writer</td>
<td>Director General</td>
</tr>
<tr>
<td></td>
<td>Peter Neyroud</td>
</tr>
</tbody>
</table>

**Name of Policy:**

**IMPACT Nominal Index (INI)**

This is a new policy

**Policy Aims, Objectives & Projected Outcomes**

The IMPACT Programme within the National Policing Improvement Agency (NPIA) will deliver an effective integrated national, regional and local information-sharing and intelligence capability, which will improve the ability of the police and partner agencies to proactively use information for intelligence purposes to prevent crime, bring offenders to justice, safeguard children and vulnerable persons and further professionalise the investigation process.

The IMPACT Programme will improve police data management through an incremental programme of business change. In doing so, the Programme will be helping to deliver 7 of the recommendations made by Sir Michael Bichard following his inquiry into the Soham murders.

IMPACT is rated as a mission critical programme by the Home Office and is a top priority for the NPIA, the Association of Chief Police Officers (ACPO) and the Association of Police Authorities (APA).

In December 2005, the IMPACT Nominal Index (INI) was introduced as the first of the IMPACT Programme products. The INI is an index of names appearing in police operational records. It enables users in one force to quickly establish which forces hold information in one or more of their local systems (covering intelligence, crime, custody, child protection, domestic violence and firearms licence refusals and revocations) on a named individual who is of interest in connection with their policing responsibilities. The information is shared with others solely for policing purposes such as preventing crime (especially protecting children and vulnerable adults) and bringing offenders to justice. The INI does not provide access to the records themselves; users must contact the forces owning the records to obtain further details or copies.

The initial deployment was to a Child Abuse Investigation Unit in each of the 43 police forces in England and Wales. Although its use is primarily to support child
protection, it is also being used in support of other operational policing areas including investigations into serious and organised crime, counter terrorism activities, and employment vetting.

The INI has now been rolled out more widely within these forces and also to the:
- Scottish Police Forces;
- Serious Organised Crime Agency;
- UK Human Trafficking Centre;
- Police Service of Northern Ireland;
- British Transport Police;
- Civil Nuclear Constabulary;
- The Ministry of Defence Police and Guarding Agency; and
- The Service Police Crime Bureau (part of the Royal Military Police)

In addition a ‘gateway’ process has been established for the following to access the INI through a nominated Home Office police force:
- Guernsey, Jersey and Isle of Man Police;
- Border and Immigration Agency; and
- Her Majesty’s Revenue and Customs

The INI therefore not only addresses but also goes beyond the second of Sir Michael Bichard’s recommendations: “the Police Local Cross-Check system, which flags that intelligence is held about someone by particular police forces, should be introduced in England and Wales by 2005”.

Responsibility for the system was transferred within the NPIA from the IMPACT Programme to Operational Services Directorate in March 2008, recognising that the INI had become part of normal policing business. The NPIA continues to provide support and assistance to police forces in their use of the INI.

Chief Officers, as data controllers in common for the information on the INI, are responsible for ensuring that the information is processed in accordance with the requirements of relevant legislation including the Data Protection, Human Rights and equality and diversity Acts.

<table>
<thead>
<tr>
<th>Will the policy have an impact on national or local people/staff?</th>
<th>Yes – the INI will impact directly on police officers and staff across England and Wales and beyond, particularly those in the child protection business area. It will also have an impact on the subjects of the information (mainly suspects, offenders, etc.) and indirectly on the public more generally in terms of making communities safer by improving the Police Service’s ability to prevent and detect crime.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy?</td>
<td>Yes – particular groups (such as BMEs) may have different experiences and attitudes to the police and the information and intelligence that they collate. Similarly, given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. Whilst the INI will not directly affect either, it could exacerbate the issues due to the wider visibility of the information.</td>
</tr>
<tr>
<td>Are there any aspects of the policy that could contribute to equality or</td>
<td>No – The INI uses only index information, and does not contain information relating specifically to any communities or groups. Whilst it does contain</td>
</tr>
</tbody>
</table>
The INI is a web based tool, enabling users (police personnel) to utilise web products which make IT more accessible for users with disabilities.

If your answer to any of these questions is **YES, go on to the full EIA.**

If you have answered **NO to any particular questions**, please provide explanatory evidence.

If you have answered **NO to all of these questions** then you must also attach the following statement to all future submissions that are related to this policy and ensure it is signed off by senior management. You must also include this statement within any regulatory impact assessment that is related to this policy.

“**This policy was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. As a result of this screening, it has been decided that a full equality impact assessment is not required. **"
**FULL EQUALITY IMPACT ASSESSMENT**

<table>
<thead>
<tr>
<th>Date of assessment</th>
<th>10 August 2007 – March 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Policy Writer</td>
<td></td>
</tr>
<tr>
<td>Director General</td>
<td>Peter Neyroud</td>
</tr>
</tbody>
</table>

**STATISTICS & RESEARCH**

*What relevant quantitative & qualitative data do you have in relation to this policy?*

Please site any quantitative (e.g. statistical research) and qualitative evidence (monitoring data, complaints, satisfaction surveys, focus groups, questionnaires, meetings, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy area.

<table>
<thead>
<tr>
<th>Equality Target Areas</th>
<th>How does the data identify potential or known positive impacts?</th>
<th>How does the data identify any potential or known adverse impacts?</th>
</tr>
</thead>
</table>
| **Race**              | The need for the Police Service to improve the way that it manages information was identified by Sir Michael Bichard’s inquiry into the Soham murders. Positive impacts of the implementation of the INI are as follows:  
- Decision making based on more comprehensive information;  
- Quicker access to information; and  
- Enhanced cross-force border crime prevention and detection. |
| (consider e.g. nationalities, Gypsies, Travellers, languages) |                                                               |                                                                  |
| **Disability**        | The positive impact that the INI has had within the Police Service is demonstrated by the number of operational searches carried out on the system. Over the 12 months to March 2008 (when the system transferred to NPIA Operational Services Directorate), use of the INI tripled to around 36,000 searches per month. By the end of that period, over 460,000 searches had been conducted since the system was implemented. Around 1 tenth of these had led to follow up enquiries and surveys had indicated that, in a third of those instances, the information recovered was of value to the investigating officer. As at the end of November 2008 874,470 search and find enquiries had been carried out on the INI since December 2005. March 2009 had the highest number of search and find enquiries in one month with 78,912 carried out. Surveys have also indicated that in around 670 cases a year referred to the Police under section 47 of the Children Act 1989, the information obtained caused a different decision to be reached with clear benefits in terms of the safety and welfare of the children concerned. There were 69 million records on the system by the end |                                                                  |
| (consider social access and physical access) |                                                               |                                                                  |
| **Gender**            |                                                               |                                                                  |
| **Gender Identity**   |                                                               |                                                                  |
| **Religion and Belief** |                                                               |                                                                  |
| **Sexual Orientation** |                                                               |                                                                  |
| **Age**               |                                                               |                                                                  |
of March 2009.
The system does not include any information on the race, disability, gender identity, religion / belief / non belief or sexual orientation of subjects. The index is made up of information submitted by forces. Its composition therefore reflects the records that forces hold on their local systems that they are willing and able to have loaded onto the system.

What research have you considered commissioning to fill any data gaps?
For example, you may need to ensure quantitative & qualitative data groups include stakeholders with respect to this policy. N.B Include any recommendations in your action plan

The need for an improvement in the management and sharing of information between police forces, and specifically the need for the INI system, was identified as part of Sir Michael Bichard’s Inquiry. A public consultation exercise was conducted early in 2008 and the responses published in an Outcome Report available on the NPIA Website (further details provided later in this document). Whilst, in theory, it might be possible using the INI to check the number of records by gender or age range, this would be, at best, time consuming and in some cases would cause the search to “time out”. In addition, this would only return data on the number of records; as any individual might have more than 1 record on the system (due to coming into contact with more than one force, or multiple contacts with the same force), this would not necessarily accurately reflect the number of individuals in any age range or of a particular gender. As the INI is only an index and an interim system, and as establishing a breakdown of the records / individuals on the INI by gender, age, race, disability, gender identity, religion / belief / non belief or sexual orientation could only be completed at disproportionate cost, there are no plans to commission further research.

Who are the stakeholders, community groups, staff or customers for this policy area?

Ministers and colleagues in Home Office, Ministry of Justice and other departments / agencies  
Bichard Strategic Implementation Programme  
Other parts of the National Policing Improvement Agency  
IMPACT Programme Regional Coordinators  
Association of Chief Police Officers / individual chief officers  
Association of Police Authorities / individual police authorities  
Her Majesty’s Inspectorate of Constabulary  
Police officers and staff, and staff associations / support organisations  
Other law enforcement agencies  
Information Commissioner’s Office  

Individuals who are the subject of or named in police records  
Wider community / public  
Equalities and Human Rights Commission (EHRC)  
NACRO
What are the overall trends and patterns in this qualitative & quantitative data?

No overall trends or patterns have been identified at this stage. This will continue to be monitored.

Please list the specific equality issues that may need to be addressed through consultation (and further research)?

The INI itself is not considered to raise any equality issues. However, the use of the system and particularly the information on it could do. Material was therefore added to the Business Rules to stress the need to consider equality and diversity issues in using the INI and any data obtained from it. Likewise, the rules recommend that auditors monitor INI usage for any unusual or suspicious patterns of enquiries, including anything which suggests discriminatory behaviour. Training material and other key documentation will continue to take equality into consideration.

GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

INTERNAL STAKEHOLDER ENGAGEMENT: Consulting & involving Other Government Departments, Staff, Agencies & NDPBs

<table>
<thead>
<tr>
<th>Does this policy affect the experiences of staff? How? What are their concerns?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Staff</strong></td>
</tr>
<tr>
<td><strong>Staff Networks &amp; Associations</strong></td>
</tr>
<tr>
<td><strong>Trade Unions</strong></td>
</tr>
</tbody>
</table>

How have you consulted, engaged and involved internal stakeholders in considering the impact of this proposal on other public policies and services?

For example your policy may affect access to housing, education, health, employment services.
This policy should have no equality impact on other public policies and services. The Police Service and other internal and external stakeholders were extensively consulted as part of the Bichard Inquiry.

Various interested parties (such as ACPO, APA and the Ministry of Justice) are represented on the IMPACT Programme Board and Business Design Authority, and on the Bichard Strategic Implementation Programme Board which co-ordinates delivery of the Bichard recommendations.

Regular reports (initially 6 monthly) have been produced and published on progress on the Bichard Recommendations. These are cleared with Ministers in interested Departments.

In addition, there is a quarterly Regional Coordinators meeting at which the concerns and queries of the system’s users are discussed.

A public consultation exercise in respect of Equality, Diversity and Privacy was conducted by the IMPACT Programme between January and April 2008. The consultation was sent directly to 47 organisations, and to all 43 police forces in England and Wales. There were also 800 unique visits to the consultation document on the NPIA website. A total of 17 responses were received to the consultation, mainly from police forces, police authorities or police related associations.

What positive and adverse impacts were identified by your internal consultees? Did they provide any examples?

Two issues were raised in response to the consultation:

(i) whether or not information on the physical and mental health of an individual was available on the INI. This information is not included on the INI system. However forces do need to be aware of this sensitivity when contacted for information on an individual as a result of an INI search. It will be recommended that the Business Rules be revised to provide advice to forces about releasing equality and diversity information (see recommendations).

(ii) the fact that there are almost as many records held on the INI as people in the UK. This is not really an equality and diversity issue and it is also easily answered: the INI does not have the ability to consolidate records held by individual forces relating to a single individual. The linking and matching of records relating to the same person is an area which is being addressed through the ongoing development and implementation of the Police National Database.

The “Soundex” facility used to locate names that sound similar to the one being searched may not work equally well with different types of names, but this is not expected to have a significant impact on any group.

No other significant equality issues have been identified by the stakeholders.

A copy of the report describing the outcome of the public consultation exercise was sent to all consultees whether they responded or not.

Feedback the results of this internal consultation and use it as a basis for work on external consultation.
EXTERNAL CONSULTATION & INVOLVEMENT

How did your engagement exercise highlight positive and negative impacts on different communities?

| Voluntary Organisations | As mentioned above, the equality, diversity and privacy consultation was sent to 47 other agencies as well as the 43 England and Wales police forces. These included a range of police support and staff agencies, but also external organisations such as the Equalities and Human Rights Commission and bodies representing a range of different groups. The response from external consultees was notably limited. No equality issues regarding the INI were identified by external consultees. |
| Race | |
| Faith | |
| Disability Rights | |
| Gender | A copy of the report describing the outcome of the consultation was sent to all consultees whether they responded or not. |
| Gender Identity | Following the limited response from the aforementioned consultation, wider consultation was conducted using various methods to ensure as wide a range of views as possible. This was completed through one to one interviews with representatives of both public and third sector agencies and organisations, engaging with local community groups, radio |
| Sexual Orientation | |
| Age | |

Feedback the results of your community engagement (i.e. involvement and consultation) to all participants including internal and external stakeholders

ASSESSMENT & ANALYSIS

Does the EIA show a potential for differential impact on any group(s) if this proposal is introduced? If Yes, state briefly whether impact is adverse or positive and in what equality areas.

Given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. Whilst the INI will not affect this, the wider visibility of information between forces could exacerbate issues associated with this.

What were the main findings of the engagement exercises and what weight should they carry?

The public consultation exercise highlighted one equality issue relating to the sharing of sensitive information following contact through an INI search. The Programme has recommended that this be addressed through advice included in the next review of the Business Rules. This issue has no affect on the policy.

The data available to date highlights the positive impact of the INI system which has significantly improved the ability of forces to successfully investigate crime, manage threats to both the public and individuals, and make our communities safer.

Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain group of people from obtaining services, or limit their participation in any
aspect of public life?

No – Given that:

• the INI is simply an index of information already held by the police,
• it does not contain any information on race, religion / belief / non-belief, gender identity, disability or sexual orientation;
• forces have been instructed not to load information on victims and witnesses; and
• users are instructed that no undue inference should be made about an individual simply because that person’s details match those of one or more records on the INI,

the policy does not have the potential to cause unlawful direct or indirect discrimination.

Participation in aspects of public life will not be limited by the policy; neither will specific groups be limited from obtaining services.

There are various channels that members of the public and staff can bring concerns/complaints in relation to discrimination, including:

• the Chief Constable/Police Authority Chair
• the Independent Police Complaints Commission
• diversity staff associations e.g. BAWP, GPA, Unison, Federation
• the Equalities and Human Rights Commission
• the Information Commissioner
• their local MP
• local voluntary organisations such as law centres, race equality councils and other campaign groups can also help and guide members of the public in relation to police complaints.

How does the policy promote equality of opportunity?

For the same reasons, it is not considered that the INI has any effect on equality of opportunity.

The INI is also one step in the process towards the improved and more consistent sharing of information across the Police Service. It should help to ensure that crimes can be better prevented and detected, and that investigations are not subject to inequalities brought about by the varying ability across the Service to locate relevant information.

How does your policy promote good relations? How does this policy make it possible for different groups to work together, build bridges between parallel communities, or remove barriers that isolate groups and individuals from engaging in civic society more generally?

The INI is making it possible for police forces to work more effectively together as it provides a means for locating and sharing of information that was not previously available. To obtain the actual information after conducting a search of the system, contact must be made with the force which owns the data in order for it to be released. This promotes both better working relations between forces, and assists to remove barriers in the prevention and detection of crime.

As above, the INI is not considered to have any significant effect on good relations, but better information sharing will be beneficial to communities and help to ensure
they get a better and more equal service.

How can the policy be revised, or additional measures taken, in order for the policy to achieve its aims without risking any adverse impact?

Recommendations for future INI work are as follows:

- Ensure that the revised INI Business Rules, take into consideration the need to ensure equality and the promotion of good relations, in terms of considering what information to load on the system, how the system is used and how follow up enquiries are conducted [This has now been completed].
- Training – work is ongoing to ensure that the surnames used as examples on the training system are diverse. This assists in enabling forces to create examples that are relevant to their force and thereby realistic to the trainees. This work needs to be continuously reviewed and updated.
- Auditing of the system – whilst the Programme has provided advice, Chief Officers are currently left to decide on the auditing policy for their forces, and to carry the risks of that decision. There is no absolute minimum requirement for the number of searches that are audited. A more robust and consistent auditing system would reduce the possibility of the INI system being abused. National auditors are now in place with the facility to audit the auditors.
- It is recommended that the ongoing work to ensure that there is no victim and witness information on the INI continues. The Programme team provide forces with strategies and criteria to check and improve the quality of the information on the system.
- Ensure that the Regional Co-ordinators remain fully aware of equality issues and that they promote equality as part of their work with forces (ongoing).

Are there any concerns from data gathering, consultation and analysis that have not been taken on board?

Please justify and explain the reason for your decision.

All concerns raised to date have been taken on board and responded to. Concerns have been addressed through recommendations, reassurance that existing Business Rules provide the answer, or by redirection to the relevant business area within the other two key work strands of the Programme. A separate Privacy Impact Assessment is currently being developed.

In addition, regular contact with user organisations, the Regional Coordinators, and other outreach work will ensure that forces/users and stakeholders are kept informed about new developments, and are given a chance to voice any concerns including on equality.

The INI is an interim system that will be in use until the capabilities that it provides are superseded by the Police National Database (PND), thus there is limited scope for making changes.

ENSURING ACCESS TO INFORMATION

How can you ensure that information used for this EIA is readily available in the future?

(N.B. You will need to include this in your action plan)
• Sir Michael Bichard’s reports on the findings of his inquiry, and the Government’s reports setting out the progress made on his recommendations are all public documents, available in hard copy or on the internet.
• The equality impact report will be published once completed.
• Information on the Programme is also available on the NPIA and Home Office websites.
• Responses to the consultation have been published in the “Report on the Outcome of the Equality, Diversity and Privacy Consultation” available the NPIA Website

How will you ensure your stakeholders continue to be involved/engaged in shaping the development/delivery of this policy?
(N.B. You will need to include this in your action plan)

The NPIA Operational Services Directorate maintains regular contact with forces, and supports Police Forces in providing training and advice to INI users. The IMPACT Programme’s Regional Coordinators also act as a specific point of contact between forces and the IMPACT Programme.
Further consultation on the next draft of the Equality Impact Assessment report is planned for later in 2008, which will include specific targeting of certain external stakeholders through direct participation and consultation with the NPIA’s independent advisory panel to ensure as wide a range of views as possible has been considered.

How will you monitor this policy to ensure that the policy delivers the equality commitments required?
(N.B. You will need to include this in your action plan)

Recommendations in respect of amendments or changes to the Business Rules will be monitored to ensure inclusion. Regular contact with user organisations, the Regional Coordinators, and other outreach work will ensure that forces/users and stakeholders are kept informed about new developments, and are given a chance to voice any concerns.

Now submit your EIA and related evidence for clearance.
APPENDIX A

Police Organisations:
Association of Chief Police Officers
Association of Police Authorities
Her Majesty’s Inspectorate of Constabulary

Police Staff Associations:
Police Federation
The Police Superintendents’ Association

Police Support Organisations:
British Association of Women Police
Christian Police Association
Gay Police Association
National Association of Muslim Police
National Black Police Association
National Disabled Police Association

Government Departments and Agencies:
Criminal Cases Review Commission
Home Office (Home Office Disability Network)
Ministry of Justice

Other interested individuals, groups or organisations:
Age Concern
Blink
Commission for Equality and Human Rights
Crime Concern
East London Black Women’s Organisation
Employers’ Forum on Age
Employers’ Forum on Disability
Employment Opportunities for People with Disabilities
GLADD
Help the Aged
Information Commissioner
Liberty
Mind
Muslim Council of Britain
NACRO
National Youth Agency
Newham Asian Women’s Project
No2ID
RADAR
Refugee Council
RNIB
Skills for Justice
Stonewall
The Gender Trust
The Interfaith Network for the UK
The UK Intersex Association
Trident Independent Advisory Group
UK Youth
UK Youth Parliament
Unison
Victim Support
Women and Equality Unit
Youth Justice Board
## Appendix B

**DELEGATE LIST**

List of attendees at the NPIA National Stakeholder Engagement Event 5 July 2009

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tom Tyler</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Maymon Nahar</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Douglas Lewins</td>
<td>Metropolitan Police Authority</td>
</tr>
<tr>
<td>Phil Booth</td>
<td>NO2ID</td>
</tr>
<tr>
<td>Liam Duncan</td>
<td>Information Commissioner’s Office</td>
</tr>
<tr>
<td>Sebastian Beine</td>
<td>Criminality Information Unit (Home Office)</td>
</tr>
<tr>
<td>Caroline Cooper</td>
<td>Victim &amp; Witness Unit (Office for Criminal Justice Reform)</td>
</tr>
<tr>
<td>Paul Bygrave</td>
<td>NPIA Equality, Diversity &amp; Human Rights Team</td>
</tr>
<tr>
<td>Chris Lester</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Ian Murdoch</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Kate Firkins</td>
<td>Data Protection Officer, West Midlands Police</td>
</tr>
<tr>
<td>Jenny Martin</td>
<td>Data Analyst, West Midlands Police</td>
</tr>
<tr>
<td>Richard Allen</td>
<td>Data Protection Officer, Lancashire Police</td>
</tr>
<tr>
<td>Robert Smith</td>
<td>NPIA IMPACT Programme – Business Rules</td>
</tr>
<tr>
<td>Kate Sale</td>
<td>Representing Youth Justice Board/ACPO Children &amp; Young Persons Business Area</td>
</tr>
<tr>
<td>Chris Morrall</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (E &amp; D Lead)</td>
</tr>
<tr>
<td>Andrew McConaghy</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (Privacy Lead)</td>
</tr>
<tr>
<td>David Stevens</td>
<td>Senior User</td>
</tr>
<tr>
<td>Dianna Yach</td>
<td>Ionann Management Consultants</td>
</tr>
<tr>
<td>Dez O’Neill</td>
<td>Ionann Management Consultants</td>
</tr>
</tbody>
</table>

### ONE TO ONE INTERVIEWS

Interviews conducted over a 4 month period between December 2008 and March 2009 with representatives of stakeholder organisations across the public, private and third sector

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe Hurn</td>
<td>Gypsy Traveller</td>
</tr>
<tr>
<td>Amy Whitelock and Anna</td>
<td>MIND</td>
</tr>
<tr>
<td>Bird</td>
<td></td>
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<tr>
<td>-----------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Owen Sharp</td>
<td>Victim Support</td>
</tr>
<tr>
<td>Tom Tyler</td>
<td>Association Police Authorities</td>
</tr>
<tr>
<td>Sam Dick</td>
<td>Stonewall</td>
</tr>
<tr>
<td>Fazil Kawani</td>
<td>Refugee Council</td>
</tr>
<tr>
<td>Dr Catherine Stone</td>
<td>Voice UK</td>
</tr>
</tbody>
</table>

**COMMUNITY GROUP CONSULTATION**

Conducted over a 3 month period between December 2008 and February 2009

<table>
<thead>
<tr>
<th>Contact</th>
<th>Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Chadwick</td>
<td>Toton Methodist Group</td>
</tr>
<tr>
<td>Nicholas Pomphrey</td>
<td>NACRO</td>
</tr>
<tr>
<td>PC Chris Hayton and Insp Lesley Mansell – Leicestershire Police</td>
<td>Loughborough Hate Crime Panel</td>
</tr>
<tr>
<td>Alan Sivori – Greater Manchester Police</td>
<td>Local Muslim Community</td>
</tr>
<tr>
<td>Abida Niaz – Community Relations Officer</td>
<td>Crescent Community Radio Station (interview and on line questionnaire)</td>
</tr>
<tr>
<td>Insp Fran Jones</td>
<td>Cambridge Police Independent Advisory Group and Police Authority Members</td>
</tr>
<tr>
<td>Everett Henry</td>
<td>NPIA Independent Advisory Panel</td>
</tr>
</tbody>
</table>
Policy Aims, Objectives & Projected Outcomes

The IMPACT Programme within the National Policing Improvement Agency (NPIA) will deliver an effective integrated national, regional and local information-sharing and intelligence capability, which will improve the ability of the police and partner agencies to proactively use information for intelligence purposes to prevent crime, bring offenders to justice, safeguard children and vulnerable persons and further professionalise the investigation process.

The IMPACT Programme will improve police information management through an incremental programme of change. The Police National Database (PND) is the most significant step towards the Programme’s goal – it will provide an extensive store of police intelligence and other operational information, initially containing and linking locally held data and ultimately linking this information with that currently held on the Police National Computer (PNC) and other national systems. In doing so, it will deliver both the 1st and 4th of Sir Michael Bichard’s recommendations following his inquiry into the Soham murders – i.e. a national intelligence system and securing the long-term future of the PNC.

IMPACT is rated as a mission critical programme by the Home Office and is a top priority for the NPIA, the Association of Chief Police Officers (ACPO) and the Association of Police Authorities (APA).

Will the policy have an impact on national or local people/staff?  Yes – it will be used widely by police officers and staff, either directly or indirectly. It will also impact on the subjects of the information (mainly suspects, offenders, etc. but possibly also...
victims and witnesses) and indirectly on the public more generally in terms of making communities safer by improving the Police Service’s ability to prevent and detect crime.

| Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy? | Yes - particular groups (such as BMEs) may have different experiences and attitudes to the police, and the information and intelligence that they collate. Similarly, given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. Whilst the PND will not directly affect either, it could exacerbate the issues due to the wider visibility of the information. |
| Are there any aspects of the policy that could contribute to equality or inequality? | Yes - whilst there are no aspects of the policy itself that could contribute to equality or inequality, its implementation could. The exact nature of the PND (in terms of the information to be loaded, the capabilities the system will provide and the business processes that will surround it) has yet to be finalised. As the system is designed and then implemented and business rules prepared, all aspects of equality and / or inequality will continue to be considered alongside other legal requirements. |
| Could the aims of the policy be in conflict with equal opportunity, elimination of discrimination, promotion of good relations? | No – The development and implementation of the PND will not be in conflict with equal opportunity, the elimination of discrimination and the promotion of good relations. As PND plans progress, consideration will be made at all key stages and within all documentation to ensure that the implementation of the policy does not conflict with equal opportunities etc. |
| If this is an amendment of an existing policy, was the original policy impact assessed? | No – The PND is not an amendment of an existing policy. The need for the Police Service to improve the way that it manages information was identified by Sir Michael Bichard’s Inquiry into the Soham murders. |

If your answer to any of these questions is **YES**, go on to the full EIA.

If you have answered **NO to any particular questions**, please provide explanatory evidence.

If you have answered **NO to all of these questions** then you must also attach the following statement to all future submissions that are related to this policy and ensure it is signed off by senior management. You must also include this statement within any regulatory impact assessment that is related to this policy.

"This policy was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. As a result of this screening, it has been decided that a full equality impact assessment is not required."
FULL EQUALITY IMPACT ASSESSMENT

Date of assessment 10 August 2007 – March 2009
Name of Policy Writer Director General Peter Neyroud

STATISTICS & RESEARCH

What relevant quantitative & qualitative data do you have in relation to this policy?
Please cite any quantitative (e.g. statistical research) and qualitative evidence (monitoring data, complaints, satisfaction surveys, focus groups, questionnaires, meetings, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy area.

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<tbody>
<tr>
<td>Race (consider e.g. nationalities, Gypsies, Travellers, languages)</td>
<td>The need for the Police Service to improve the way that it manages information was identified by Sir Michael Bichard’s inquiry into the Soham murders. The PND is, according to comments recently made by Sir Michael himself, the most important of his recommendations. Positive impacts of the PND that have been identified in the Business Case are as follows:</td>
</tr>
<tr>
<td>Disability (consider social access and physical access)</td>
<td>- An increase in the prevention and detection of crime;</td>
</tr>
<tr>
<td></td>
<td>- Reduced risk to children, vulnerable adults and police officers;</td>
</tr>
<tr>
<td></td>
<td>- An improvement in police efficiency;</td>
</tr>
<tr>
<td></td>
<td>- An increase of public confidence in the police; and</td>
</tr>
<tr>
<td></td>
<td>- Increased ability to counter terrorism, and serious and organised crime.</td>
</tr>
</tbody>
</table>

Potential impacts on equality and means of minimising adverse impacts and maximising equality of opportunity / good community relations will continue to be considered throughout the procurement, design, build, implementation and delivery of the PND.

What research have you considered commissioning to fill any data gaps?
For example, you may need to ensure quantitative & qualitative data groups include stakeholders with respect to this policy.
N.B Include any recommendations in your action plan.
The need for an improvement in the management and sharing of information between police forces, and for the PND, was identified by Sir Michael Bichard during his inquiry into the Soham murders.

A public consultation exercise was conducted early in 2008 and the responses published in an Outcome Report available on the NPIA Website (further details provide later in this document).

Following this wider engagement took place at both local and national level using a variety of consultation methods.

### Who are the stakeholders, community groups, staff or customers for this policy area?

- Ministers and colleagues in Home Office, Ministry of Justice and other departments / agencies
- Bichard Strategic Implementation Programme
- Other parts of the National Policing Improvement Agency
- IMPACT Programme Regional Coordinators
- Association of Chief Police Officers / individual chief officers
- Association of Police Authorities / individual police authorities
- Her Majesty’s Inspectorate of Constabulary
- Police officers and staff, and staff associations / support organisations
- Other law enforcement agencies
- Information Commissioner’s Office
- Individuals who are the subject of or named in police records
- Wider community / public
- Equalities and Human Rights Commission (EHRC)
- NACRO
- Other bodies representing different groups (see Appendix A for complete list)

### What are the overall trends and patterns in this qualitative & quantitative data?

To date, very few issues have been raised regarding equality in respect of the PND. That and the limited information available means it is not possible to identify any overall trends or patterns.

The majority of issues raised relate privacy and the management of police information and are dealt with through a separate Privacy Impact Assessment.

### Please list the specific equality issues that may need to be addressed through consultation (and further research)?

There were no major concerns raised regarding the equality and diversity of the PND itself. However there were concerns about:

- Controlling Use – (need for a statutory Code of Practice, Business Rules);
- Sharing of information that could be unduly detrimental to the individual concerned;
- Data Quality and Security – (access controls, auditing, language and terminology within records);
- Independent scrutiny – (need for independent ethical oversight);
- Provision of specific equality and diversity training to all those...
using/accessing the PND;
  • Inclusion of medical information, victim and witness details.

GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

INTERNAL STAKEHOLDER ENGAGEMENT: Consulting & involving Other Government Departments, Staff, Agencies & NDPBs

<table>
<thead>
<tr>
<th>Does this policy affect the experiences of staff? How? What are their concerns?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Staff</strong></td>
</tr>
<tr>
<td>The PND will enable the Police Service to identify and access relevant information and intelligence in a more efficient and useful manner, thereby improving the Service’s ability to prevent and detect crime and make communities safer. The majority of concerns raised by internal stakeholders during the public consultation exercise relate to privacy and are addressed within a separate Privacy Impact Assessment. Few concerns have been raised about equality issues (see below for details). There is a requirement on the supplier that it must be possible to make reasonable adjustments to allow the system to be used by people with disabilities.</td>
</tr>
<tr>
<td><strong>Staff Networks &amp; Associations</strong></td>
</tr>
<tr>
<td>No concerns have been raised about equality issues.</td>
</tr>
<tr>
<td><strong>Trade Unions</strong></td>
</tr>
<tr>
<td>No concerns have been raised about equality issues.</td>
</tr>
</tbody>
</table>

How have you consulted, engaged and involved internal stakeholders in considering the impact of this proposal on other public policies and services?

For example your policy may affect access to housing, education, health, employment services.

This policy should have no equality impact on other public policies and services. The Police Service and other internal and external stakeholders were extensively consulted as part of the Bichard Inquiry.

Various interested parties (such as ACPO, APA and the Ministry of Justice) are represented on the IMPACT Programme Board and Business Design Authority, and on the Bichard Strategic Implementation Programme Board which co-ordinates delivery of the Bichard recommendations.

Four reports (initially 6 monthly) have been produced and published on progress on the Bichard Recommendations. These are cleared with Ministers in interested Departments.

A public consultation exercise in respect of Equality, Diversity and Privacy was conducted by the IMPACT Programme between January and April 2008. The consultation was sent directly to 47 organisations, and to all 43 police forces in England and Wales. There were also 800 unique visits to the consultation document on the NPIA website. A total of 17 responses were received to the consultation, mainly from police forces, police authorities or police related associations.
A series of Information Management sessions were held at the 2nd set of Joining Up Workshops run by the Programme in July 2008. Amongst other things, these specifically asked attendees to consider equality and diversity issues.

What positive and adverse impacts were identified by your internal consultees? Did they provide any examples?

The equality issues raised during the consultation and the Joining Up Workshops related to:

- Prevention of inappropriate comments within free text fields
- Higher levels of authorised access for certain key words e.g. gay/bi-sexual, in free text searches, to deter frivolous searches;
- Training for staff carrying out all processes and actions – with the least opportunity to directly/indirectly discriminate and or make assumptions on information;
- Training regarding the treatment of information contained within the system with the appropriate level of sensitivity and confidentiality;
- Professional use of information that would have a high impact if misused e.g. pertaining to gay, transgender, or religious matters;
- The need for an awareness of language and terminology used to ensure that it is not discriminatory;
- Consideration of what information is recorded about an individual, and whether there is a policing purpose for collating and sharing that information;
- The need for a Code of Practice;
- Justification of why and how what information is gathered, how and why it is interpreted, how and why it is stored, and subsequent searching/sharing/release – who by, what for and who to;
- Clear definitions of categories such as suspect, offender, eliminated suspect;
- Accuracy and necessity to record information that reveals or may suggest a certain sexual orientation, and the need for checks and balances;
- The holding of victim details on the PND.

Generally, however, those that responded felt that existing police force policies and practices were sufficient to prevent any adverse impacts on equality.

Feedback the results of this internal consultation and use it as a basis for work on external consultation
How did your engagement exercise highlight positive and negative impacts on different communities?

<table>
<thead>
<tr>
<th>Voluntary Organisations</th>
<th>A wide range of force and non-force stakeholders were involved in the Bichard Inquiry. None identified any issues.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>As mentioned above, the equality, diversity and privacy consultation was sent to 47 other agencies as well as the 43 England and Wales police forces. These included a range of police support and staff agencies, but also external organisations such as the Equalities and Human Rights Commission and bodies representing a wide range of different groups. The response from external consultees was notably limited, with the majority of responses relating to privacy. These are being taken forward as part of a separate Privacy Impact Assessment.</td>
</tr>
<tr>
<td>Faith</td>
<td>Support for the Welsh Language was raised. The Programme has given due consideration to the requirements of the Welsh Language Act 1993 and the Home Office’s Welsh Language Scheme. However, the Act and the Home Office scheme apply to public services and the PND will not be providing services directly to the public; the system will only be accessible by authorised police officers and staff. In view of this, and the significant additional costs involved, the Programme has concluded that neither a Welsh language version of the user interface nor copies of the information in Welsh are necessary or practicable. A copy of the report describing the outcome of the consultation was sent to all consultees whether they responded or not. Following the limited response from the aforementioned consultation, wider consultation was conducted using various methods to ensure as wide a range of views as possible. This was completed through one to one interviews with representatives of both public and third sector agencies and organisations, engaging with local community groups, radio interview, and national stakeholder workshop (full list of consultees at Appendix B). The equality issues raised during this phase of consultation mirrored those raised by consultees previously and in addition:</td>
</tr>
<tr>
<td>Disability Rights</td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Gender Identity</td>
<td></td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td></td>
</tr>
</tbody>
</table>
Feedback the results of your community engagement (i.e. involvement and consultation) to all participants including internal and external stakeholders

**ASSESSMENT & ANALYSIS**

<table>
<thead>
<tr>
<th>Does the EIA show a potential for differential impact on any group(s) if this proposal is introduced? If Yes, state briefly whether impact is adverse or positive and in what equality areas.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Given that members of some BME groups come into disproportionately high levels of contact with the police, they are likely to be disproportionately represented in police information. Whilst the PND will not affect this, the wider sharing of information between forces could exacerbate the associated issues. Information recorded at police force level also includes belief, gender identity, sexual orientation and disability. Consideration should be given to what information is recorded about an individual, and whether there is a policing purpose for collating and sharing that information. However, all forces should already be assessing their information for equality and diversity issues as part of regular data management checks. The improved ability to proactively use information for intelligence purposes between police forces and other partner agencies will reduce risk to and safeguard children and vulnerable people, increase the prevention and detection of crime, increase ability to counter terrorism and serious and organised crime, improve police efficiency, and increase public confidence in the police.</td>
</tr>
</tbody>
</table>
### What were the main findings of the engagement exercises and what weight should they carry?

The main findings of the consultation which has taken place to date relate to the following:

- Language and terminology
- Collating, recording and sharing information
- Ensuring there is a policing purpose
- Independent scrutiny
- Training

The responses to these findings are included within the recommendations and the Equality Impact Action Plan. (See recommendations).

### Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?

The only potential that the policy has to exclude certain groups of people from obtaining services, or limit their participation in any aspect of public life, is where information exists which suggests that allowing them to do so would pose too great a risk to others – for example, preventing someone working with children or vulnerable adults where information exists that indicates that that person could pose a threat to such people.

Proper use of the system would not result in discrimination. It is in the abuse or improper use of the system or the information held that a risk of discrimination resides. We are working to ensure that the way the system is designed, and the way in which it is used, is not discriminatory.

There are various channels that members of the public and staff can bring concerns/complaints in relation to discrimination, including:

- the Chief Constable/Police Authority Chair
- the Independent Police Complaints Commission
- diversity staff associations e.g. BAWP, GPA, Unison, Federation
- the Equalities and Human Rights Commission
- the Information Commissioner
- their local MP
- local voluntary organisations such as law centres, race equality councils and other campaign groups can also help and guide members of the public in relation to police complaints.

### How does the policy promote equality of opportunity?

The PND is a further step in the process towards the improved and more consistent sharing of information across the Police Service. It should help to ensure that crimes can be better prevented and detected, and that investigations are not subject to inequalities brought about by the varying ability across the Service to locate relevant information.
<table>
<thead>
<tr>
<th>How does your policy promote good relations? How does this policy make it possible for different groups to work together, build bridges between parallel communities, or remove barriers that isolate groups and individuals from engaging in civic society more generally?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The PND will provide a means of national information and intelligence sharing that is not currently available. This will enable forces to work more effectively together in the prevention and the detection of crime, and will foster greater consistency across England and Wales. Better information sharing will be beneficial to communities and help in ensuring that they receive a better and more equal service.</td>
</tr>
</tbody>
</table>
### Recommendations for future PND work

- The final supplier should be able to demonstrate compliance with the relevant equality and diversity legislation, including compliance with the ISS4PS Style Guide Section 2.3 (v3.1). (Supplier committed to 'Delivery of Social Responsibilities, which includes assistive technology (AT) – this will form part of the overall Test Strategy)
- The development of the PND must consider ethnic monitoring, other existing performance requirements and potential future performance requirements. Data must be entered on the system, if required, in a format that is easily extractable for performance purposes.
- Consideration should be given to the wider government strategy regarding equality and diversity to ensure that the PND complies, for example, with the Home Office 3 Year Diversity Strategy.
- It should be possible for reasonable adjustments to be made to the way the PND is accessed to allow use by those with disabilities. For example, using enlarged text and colours that are not difficult to distinguish for individuals who are colour blind. (Force audit completed to ensure assistive technology will be provided for relevant users)
- Reasonable adjustments and other equality & diversity issues will also have to be considered in terms of delivering training to users
- The development of a Code of Practice which should include the need for an appropriate awareness of language, terminology and sensitivity in relation to all equality and diversity issues when collecting, recording and sharing information. (A draft of the Code of Practice for the PND will be submitted for approval during 2009).
- The development of detailed Guidance to accompany a Code of Practice. (This work has commenced)
- Ensure that equality and diversity are included within training for staff carrying out all processes and actions on the PND, and particularly, the appropriate level of treatment of sensitive and confidential information. The Programme is seeking to specifically include equality and diversity in relation to information and intelligence within the development of an Information Management Learning Programme which would apply to all users of the PND.
- Throughout the development of the PND, consideration should be given to the relevant equality, and diversity issues that may arise whilst processing data that is to be loaded onto the system.
- Each force conducts a local equality impact assessment or reviews its existing equality and diversity policies and procedures in the context of deployment of the PND within their force.

### Are there any concerns from data gathering, consultation and analysis that have not been taken on board?

All concerns raised to date have been actioned either through recommendations, inclusion within the Equality Impact Assessment Action Plan, or through direction to the relevant business area. Consultations and regular contact between forces, the Regional Coordinators, and other outreach work will continue to ensure that forces / users and other stakeholders are kept informed about new developments, and are
ENSURING ACCESS TO INFORMATION

How can you ensure that information used for this EIA is readily available in the future?
(N.B. You will need to include this in your action plan)

- Sir Michael Bichard’s reports on the findings of his inquiry, and the Government’s reports setting out the progress made on his recommendations, are all public documents, available in hard copy or on the internet.
- The equality impact report will be published once completed.
- Information on the Programme is also available on the NPIA and the Home Office websites.
- Responses to the public consultation exercise have been published in the “Report on the Outcome of the Equality, Diversity and Privacy Consultation” available the NPIA Website
- It is intended to be as transparent as is possible about how the PND operates and is used without compromising delivery of the aims of preventing and detecting crime. The Code of Practice and much of the guidance will therefore be published.

How will you ensure your stakeholders continue to be involved / engaged in shaping the development / delivery of this policy?
(N.B. You will need to include this in your action plan)

Development of the requirements has involved, and continues to involve, close collaboration with the Police Service. The governance structure (in particular the Programme Board and Business Design Authority) has strong representation from the Service and other stakeholders.

The IMPACT Programme’s Regional Coordinators also act as a specific point of contact between the forces and the Programme.

We expect a further report on the progress of the Bichard Inquiry recommendations will be published later this year, covering the development and implementation of the PND.

The Code of Practice and accompanying Guidance will be subject to quite wide consultation.

How will you monitor this policy to ensure that the policy delivers the equality commitments required?
(N.B. You will need to include this in your action plan)

Regular contact with user organisations, the Regional Coordinators, and other outreach work will ensure that forces / users and stakeholders are kept informed about new developments, and are given a chance to voice any concerns.

The Programme will involve the NPIA’s Independent Advisory Panel, to assist in monitoring this policy.

It is planned that the PND will provide a comprehensive auditing capability which will be both proactive and reactive, at a local through to national level. All actions logged
will be subject to audit.
The Code of Practice will be looking to review forces’ progress towards full implementation and this may be subject to HMIC scrutiny.
Whilst IMPACT will ensure that the central design, delivery and deployment of the PND is compliant with equality and diversity requirements, including such things as business rules, responsibility for how the PND and the data on it are used ultimately resides with Chief Officers and it must be for them to ensure compliance within their forces.
APPENDIX A

Police Organisations:
Association of Chief Police Officers
Association of Police Authorities
Her Majesty’s Inspectorate of Constabulary

Police Staff Associations:
Police Federation
The Police Superintendents’ Association

Police Support Organisations:
British Association of Women Police
Christian Police Association
Gay Police Association
National Association of Muslim Police
National Black Police Association
National Disabled Police Association

Government Departments and Agencies:
Criminal Cases Review Commission
Home Office (Home Office Disability Network)
Ministry of Justice

Other interested individuals, groups or organisations:
Age Concern
Blink
Commission for Equality and Human Rights
Crime Concern
East London Black Women’s Organisation
Employers’ Forum on Age
Employers’ Forum on Disability
Employment Opportunities for People with Disabilities
GLADD
Appendix B

DELEGATE LIST
List of attendees at the NPIA National Stakeholder Engagement Event 5 July 2009

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tom Tyler</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Maymon Nahar</td>
<td>Association of Police Authorities</td>
</tr>
<tr>
<td>Douglas Lewins</td>
<td>Metropolitan Police Authority</td>
</tr>
<tr>
<td>Phil Booth</td>
<td>NO2ID</td>
</tr>
<tr>
<td>Liam Duncan</td>
<td>Information Commissioner’s Office</td>
</tr>
<tr>
<td>Sebastian Beine</td>
<td>Criminality Information Unit (Home Office)</td>
</tr>
<tr>
<td>Caroline Cooper</td>
<td>Victim &amp; Witness Unit (Office for Criminal Justice Reform)</td>
</tr>
<tr>
<td>Paul Bygrave</td>
<td>NPIA Equality, Diversity &amp; Human Rights Team</td>
</tr>
<tr>
<td>Chris Lester</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Ian Murdoch</td>
<td>NPIA IMPACT Programme</td>
</tr>
<tr>
<td>Kate Firkins</td>
<td>Data Protection Officer, West Midlands Police</td>
</tr>
<tr>
<td>Jenny Martin</td>
<td>Data Analyst, West Midlands Police</td>
</tr>
<tr>
<td>Richard Allen</td>
<td>Data Protection Officer, Lancashire Police</td>
</tr>
<tr>
<td>Robert Smith</td>
<td>NPIA IMPACT Programme – Business Rules</td>
</tr>
<tr>
<td>Kate Sale</td>
<td>Representing Youth Justice Board/ACPO Children &amp; Young Persons Business Area</td>
</tr>
<tr>
<td>Chris Morrall</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (E &amp; D Lead)</td>
</tr>
<tr>
<td>Andrew McConaghy</td>
<td>NPIA IMPACT Programme Policy &amp; Legal (Privacy Lead)</td>
</tr>
<tr>
<td>David Stevens</td>
<td>Senior User</td>
</tr>
<tr>
<td>Dianna Yach</td>
<td>Ionann Management Consultants</td>
</tr>
<tr>
<td>Dez O’Neill</td>
<td>Ionann Management Consultants</td>
</tr>
</tbody>
</table>

ONE TO ONE INTERVIEWS
Interviews conducted over a 4 month period between December 2008 and March 2009 with representatives of stakeholder organisations across the public, private and third sector

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe Hurn</td>
<td>Gypsy Taveller</td>
</tr>
<tr>
<td>Amy Whitelock and Anna Bird</td>
<td>MIND</td>
</tr>
</tbody>
</table>
COMMUNITY GROUP CONSULTATION
Conducted over a 3 month period between December 2008 and February 2009

<table>
<thead>
<tr>
<th>Contact</th>
<th>Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Chadwick</td>
<td>Toton Methodist Group</td>
</tr>
<tr>
<td>Nicholas Pomphrey</td>
<td>NACRO</td>
</tr>
<tr>
<td>PC Chris Hayton and Insp Lesley Mansell – Leicestershire Police</td>
<td>Loughborough Hate Crime Panel</td>
</tr>
<tr>
<td>Alan Sivori – Greater Manchester Police</td>
<td>Local Muslim Community</td>
</tr>
<tr>
<td>Abida Niaz – Community Relations Officer</td>
<td>Crescent Community Radio Station (interview and on line questionnaire)</td>
</tr>
<tr>
<td>Insp Fran Jones</td>
<td>Cambridge Police Independent Advisory Group and Police Authority Members</td>
</tr>
<tr>
<td>Everett Henry</td>
<td>NPIA Independent Advisory Panel</td>
</tr>
</tbody>
</table>