

APPENDIX C - Devon & Cornwall Police Authority
Race Equality Risk Register - Risk Assessment and Action Plan

1-9 Low
10-14 Medium
15-25 High

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|--|---|---|---|------------------|---------|--------|--------|---|--|---|---|---|
| | | | | | Likelihood | Overall | | | | | | | |
| 1 | Unequal balance in Member representation due to decisions that are outside our control | If the Authority's members are over-represented by any racial group due to the process of member selection by the Councils and/or by the Magistracy. (April 08: No Members of any BME group.) | Reputational / Operational | Lack of trust & confidence in the Police Authority. Lack of a race equality focused approach in the Police Authority. Police Authority not truly representative of its communities. | 4 | 3 | 12 | M | 1) Councils also have to comply to the Race Equality Duty 2) Change in structure from 01/10/08. (This structure is set to change as of 1 Oct 08 to 10 council members and 9 independents of who at least one should be a Lay Justice) | Chairman of the Authority / Chairman of the Human Resources Committee | 1) Consider new ways of undertaking recruitment campaigns 2) Adopt a 'positive action' approach 3) Pro actively marketing of the Authority | 1) Start April 2008 2) On-going 3) On-going - to be reviewed April 2009 3) On-going | There is a lack of control over this risk due to member selection by the Councils, which will therefore have to be tolerated to some extent |
| 2 | Failure to engage with a representative section of our communities | If we fail to actively engage with / be accessible to all the racial groups who live, work or visit 'our' area our accountability and transparency may be called into question | Reputational / Strategic / Operational / Compliance | Lack of trust & confidence in the Police Authority. Lack of a race equality approach in the Police Authority. Lack of appropriate consultation / engagement. | 3 | 3 | 9 | L | 1) Various community engagement processes / initiatives in place (e.g. PALMs, surveys) 2) Police Authority Website (info available in a range of different formats, FOI scheme, 'Contact us' section in different languages) 3) Targetted consultation (Kongomana, Respect Festival) 4) Equality Schemes, updates and audits published on website 5) Appropriate & on-going consideration by Community Engagement committee (i.e. to the extent to which the needs of different racial groups are taken into consideration / account in the delivery of our services and functions). | Chief Executive of the Authority/ Chairman of Community Engagement Committee (Although this is a responsibility on all Police Authority staff) | 1) Agree and adopt a pro-active marketing strategy for the Authority 2) Undertake an EIA of the Community Engagement Policy 3) More consultation / engagement work done in partnership 4) Independent Advisory Group involvement or updates 4) Clear understanding of the communities it serves (incl. awareness of new and 'emerging' communities) | 1&2&3) On-going 1) To be reviewed in April 2009 2)to be finished by Nov 2008 4) Work in progress - finished by Nov 2009 | |

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|--|---|--------------------------|---|------------------|---------|--------|--------|--|---|---|---|---|
| | | | | | Likelihood | Overall | | | | | | | |
| 1 | Recruitment advertisement for members not reaching the appropriate target audience | Failure to reach the widest audience (so to provide all racial groups with equal opportunities) when advertising for independent members | Operational | Lack of trust and confidence in the Police Authority. Missing opportunity to positively expand Police Authority membership / add expertise and knowledge | 3 | 3 | 9 | L | 1) Wide ranging advertisement campaigns 2) Home Office scrutiny / involvement in process 3) Relevant policies and working practices in place and audited | Chief Executive of the Authority & Chairman of the HR Committee | 1) Consider new ways of undertaking recruitment campaigns 2) Adopt a 'positive action' approach 3) Pro actively marketing of the Authority | 1) Start April 2008 2) On-going 3) On-going - to be reviewed April 2009 3) On-going | Independent members' recruitment process to start in April 08. Note that our BME & mixed race community is 0.41% of the total population of Devon & Cornwall and the Isles of Scilly. |
| 4 | Failure to seize the opportunities embodied in the Race Equality Scheme during partnership working | Failure of the Authority to secure agreement from its partners to arrangements for planning, funding and managing joint work that will allow it to meet its statutory racial equality duty. | Operational / Compliance | Negative impact on the quality of service delivery. Lack of good practice amongst partners. Risk of litigation and negative impact on Police Authority's reputation | 3 | 3 | 9 | L | 1) CDRPs - all partners are subject to the general duty 2) Commitment to Race Equality Scheme and appropriate scrutiny of its own and the Force's responsibilities as part of this as linked to Partnership working | Chief Executive of the Authority | Monitor effectiveness of existing controls and develop as appropriate - certainly with a focus on 1) how and when this is monitored and scrutinised and 2) What are realistic expectations and parameters | Spring 2009 | |
| 1 | Damage to Authority's reputation due to lack of race equality in recruitment / appointment processes | If the Authority's members, officers or the Force's Chief Officers are over-represented by any racial group which might be explained as the Authority's disregard for race equality principles and a lack of desire to represent its communities. | Reputational | Lack of trust & confidence in the Police Authority. Lack of a race equality focused approach in the Police Authority. Authority is not representative of its communities. | 3 | 3 | 9 | L | 1) Wide reaching recruitment campaigns 2) HMIC, Home Office & 'appropriate others' involvement with members' processes 3) Race-neutral approach to selection process 4) Flexible working practices 5) Relevant policies in place & audited 6) APA aware and involved on a national and local level | Chairman of the Authority, Chairman of HR Committee | 1) Agree and adopt a pro active marketing strategy for the Authority 2) Adopt a 'positive action' approach 3) Focus on retention and progression | On-going to be reviewed April 2009 | |

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|--|---|---------------------------|--|------------------|---------|--------|--------|--|--|--|---|--|
| | | | | | Likelihood | Overall | | | | | | | |
| 1 | Unequal race balance in the appointment of senior police officers | The Constabulary's Chief Officers Group is over-represented by any racial group. April 08: No BME members in COG team | Reputational | Lack of trust and confidence in the Police Authority. Bad publicity. Lack of race balance / approach in Constabulary Chief Officers Group. | 2 | 4 | 8 | L | 1) Relevant policies and practices in place, audited and monitored 2) Extensive advertising campaign 3) Home Office involvement 4) APA aware and involved on a national level | 1) Chairman of the Authority 2) Chairman of HR Committee | Monitor effectiveness of existing controls and develop as appropriate - certainly with a focus on positive action & retention | On-going to be reviewed April 2009 | The Authority has little influence over the pool of available applicants. Solution must be part of a longer term strategy of positive action & culture change. The APA is aware and involved on a national level. |
| 4 | Failure by the Authority to implement / champion its Race Equality Scheme strategy | Failure by the Authority to positively act on the Race Equality Scheme. If the Authority is found to be non-compliant in its duties laid out by the Equality Act, the Chief Executive could face legal prosecution. Bad publicity for the Police Authority. Damage of community relations duties include: Promoting race equality, Making our services accessible, Monitoring employment. | Compliance / Reputational | Lack of trust & confidence in the Police Authority. Deterioration of the quality of service delivery. Failure to meet statutory duties and risk of legal action. | 2 | 3 | 6 | L | 1) Ongoing process of audit and impact assessments 2) Relevant Police Authority committees & Diversity Workgroup asking for updates and relevant monitoring / scrutiny progress 3) APA Monitoring 4) Risk Management prioritisation approach | Chairman of the Authority & Diversity Lead Member | Planning 'how' to mainstream race equality into our day to day business - agree a system to ensure all reviews, work and reports are Equality & Diversity compliant incl. Committee papers | For consideration at every Diversity Workgroup meeting - to be reviewed in April 2009 | Building race equality standards and objectives into routine organisational procedures such as policy and budget approval documentation, organisational targets and objectives and individual job descriptions and appraisals. |

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|---|--|---|---|------------------|---------|--------|--------|---|---|--|---|----------|
| | | | | | Likelihood | Overall | | | | | | | |
| 4 | Failure by the Force to implement / champion its Race Equality Scheme strategy | Failure by the Force to positively act on the Race Equality Scheme. If the Force is found to be non-compliant in its duties laid out by the Equality Act, they could face legal prosecution. Bad publicity for the Force and Police Authority. Damage of community relations duties include: Promoting race equality, Making our services accessible, Monitoring employment. | Compliance / Operational | Lack of trust & confidence in the Constabulary. Deterioration of the quality of service delivery. Failure to meet statutory duties and risk of legal action, to impact on the Police Authority as well. | 2 | 3 | 6 | L | 1) Relevant Police Authority Committees & Diversity Work group asking for updates (via agreed reporting protocols) and ensuring duty is adhered to 2) Holding the Chief Officer to account 3) Police Authority members involved in Force Equality and Diversity Panel 4) Lead member 5) Regular meetings between the Chief Officers Group and Police Authority 6) Improved governance structure in Force 7) Chief Officer holds national Race & Diversity Portfolio | 1) Chairman of the Human Resources & Community Engagement Committees 2) Diversity Lead Member & Diversity Workgroup | 1) Further improve the way the Authority monitors and scrutinises Force Performance 2) Further enhance members' and officers' knowledge as to how the duty will impact on Force service delivery and where particular scrutiny is needed (training / mentoring) with a focus on Employment monitoring (retention / progression) | On going impact assessment by April 09 | |
| 4 | Failure to measure / scrutinise / hold the Force accountable for its performance around race equality | Failure by the Authority to ensure that the Force acts positively on and is held accountable to the Race Equality Scheme (including complaints in relation to Race Equality) | Compliance / Reputational / Strategic / Operational | Lack of trust and confidence in the Police Authority. Constabulary performance and service delivery negatively affected. | 3 | 2 | 6 | L | 1) Relevant Police Authority Committees & Diversity Work group asking for updates (via agreed reporting protocols) and ensuring duty is adhered to 2) Holding the Chief Officer to account 3) Police Authority members involved in Force Equality and Diversity Panel 4) Lead member 5) Regular meetings between the Chief Officers Group and Police Authority 6) Improved governance structure in Force 7) Chief Officer holds national Race & Diversity Portfolio | 1) Chairman of the HR Committee 2) Diversity Lead Member 3) Chief Executive of the PA | 1) Improve the way the Authority monitors and scrutinises Force Performance 2) Further enhance members' and officers' knowledge as to how the duty will impact on Force service delivery and where particular scrutiny is needed a) Clear focus on complaints monitoring b) Specific focus on internal staffing issues (recruitment, retention, progression and training) (Staff Survey) and key operational data on e.g. Hate Crime and Victim Satisfaction 3) Effective and meaningful consultation with staff associations and groups 4) Develop a Stop & Search strategy as part of Community Engagement 5) Develop appropriate Performance Indicators to monitor progress | To be addressed by the Diversity Workgroup via the implementation of the APA Police & Justice Act Guide - impact assessment by April 09 | |

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|---|--|---|---|------------------|---------|--------|--------|--|--|---|------------------------------------|--|
| | | | | | Likelihood | Overall | | | | | | | |
| 3 | Lack of equal opportunities of (personal) development for officers and members | If Authority staff feels barred from / hindered in personal development opportunities (e.g. training, promotion, or flexible working) | Operational / Compliance / Strategic | Inability to attract high quality staff with diverse skills and inputs. Negative impact on quality & level of service delivery. Negative impact on Police Authority's reputation. Bad publicity and lack of trust and confidence in Police Authority. | 3 | 2 | 6 | L | 1) Relevant policies and working practices in place, audited and monitored 2) APA & Home Office monitoring 3) Many positive employment practices in place e.g. Flexible working 4) Race equality recorded and monitored 5) Police Authority Human Resources adviser in place | Chief Executive of the Authority & Chairman of the HR Committee | Continue with existing controls. Additionally focus on issues around retention and progression. | On-going to be reviewed April 2009 | The Authority has very few members of staff, this has implications for monitoring. |
| 4 | Failure to monitor & address weaknesses in Authority's performance | Failure to monitor compliance to the Duty within Authority performance, practices and service delivery and failure to address non-compliance | Operational / Reputational / Strategic / Compliance | Lack of trust & confidence in the Police Authority. Deterioration of the quality of service delivery. Failure to meet statutory duties and risk of legal action. | 3 | 2 | 6 | L | 1) On going audit and impact assessments of all policies, practices and functions 2) Relevant Police Authority Committee & Diversity Work group providing scrutiny and asking for progress updates 2) APA Monitoring | Chief Executive of the Authority & Diversity Lead Member | 1) Continue undertaking audit and impact assessments with clear agreements as to monitoring and scrutiny by relevant committee 2) Monitor effectiveness of existing controls and develop as appropriate | On-going to be reviewed April 2009 | |
| 3 | Discriminatory behaviour and harassment by or to members / officers | If any Authority staff behaves in a discriminatory way or engages in harassing others | Operational / Reputational / Compliance | Lack of trust and confidence in the Police Authority. Negative impact on its ability to attract staff. Negative impact on providing a quality service. | 3 | 2 | 6 | L | 1) Relevant policies and working practices in place, audited and monitored (incl. Complaints Procedure) 2) Regular and structured Staff Appraisals and training 3) New Code of Conduct for Members & Officers 4) All Members sit on Diversity Work group 5) Diversity Training provided to all members, officers and ICVs. | 1) Chairman of the Authority 2) Chief Executive of the Authority | Continue with existing controls with specific focus on new Members' and officers' Induction | On-going to be reviewed April 2009 | |
| 1 | Recruitment advertisement for officers not reaching the appropriate target audience | Failure to reach the widest audience (so to provide all racial groups with equal opportunities) when advertising for Authority staff | Operational | Lack of trust and confidence in the Police Authority. Missing opportunity to positively expand Police Authority staff / add expertise and knowledge | 2 | 2 | 4 | L | 1) Relevant policies and practices in place, audited and monitored 2) Appropriate advertising campaign (bearing in mind current climate and staffing issues) | 1) Chief Executive of the Authority 2) Chairman of HR Committee | Monitor effectiveness of existing controls - focus on positive action + retention & progression | On-going to be reviewed April 2009 | |

| Ref | Risk Identified | Risk Description | Cat | Potential Outcome | Management Score | | Impact | Rating | Existing Controls | Owner | Action | When | Comments |
|-----|--|---|---|---|------------------|---------|--------|--------|--|---|--|-------------------|----------|
| | | | | | Likelihood | Overall | | | | | | | |
| 1 | Recruitment of members and / or officers undertaken in a discriminatory way | Failure of fair and transparent recruitment and selection processes | Operational / Reputational / Compliance | Lack of trust and confidence in the Police Authority. Negative impact on its ability to attract staff. | 2 | 2 | 4 | L | 1) Relevant policies and working practices in place, audited and monitored 2) APA & Home Office monitoring 3) Clear understanding of the terms positive action, discrimination and positive discrimination / affirmation 4) Code of Conduct for Members and Officers | 1) Chief Executive and Chairman of the Police Authority 2) Chairman of HR Committee | Continue with the existing controls | Review April 2009 | |
| 4 | Failure to seize the opportunities embodied in the Race Equality Scheme during procurement processes | Failure to build in the relevant race equality considerations into the procurement / contract processes | Operational / Compliance / Reputational | Negative impact on the quality of service. Lack of good practice amongst contractors. Risk of litigation and negative impact on Police Authority's reputation | 1 | 3 | 3 | L | 1) Part of the scrutiny process of the Police Authority in relation to the Constabulary - overview of controls and parameters undertaken 2) In addition we have a duty of care | Chief Executive of the Authority | Continue with the existing controls - obtain yearly updates - certainly with a view to progressing to a Single Equality Scheme | Review April 2009 | |

References:

- 1 = Recruitment and Appointments
- 2 = Community Engagement
- 3 = Officer / Member working practices
- 4 = Performance / Scrutiny