

APPENDIX C - Devon & Cornwall Police Authority
 Disability 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 there is no proportionate representation of disabled members on the Police Authority due to the process of member selection by the Councils.	Reputational / Operational	Lack of trust & confidence in the Police Authority. Lack of a disability equality focused approach in the Police Authority. Police Authority not truly representative of its communities.			0		Councils also have to comply to the Disability Equality Duty	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		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 disabled 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 disability equality approach in the Police Authority. Lack of appropriate consultation / engagement.			0		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, looking at adding BSL) 3) Targetted consultation (Disability Show) 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 disabled 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 proactive marketing strategy for the Authority 2) Undertake an EIA of the Community Engagement Policy 3) More consultation / engagement work done in partnership 4) (Strategic) Independent Advisory Group involvement or updates 5) Clear understanding of the communities it serves (incl. awareness of new and 'emerging' communities and the fact that the disabled community is not an homogeneous group)		
1	Recruitment advertisement for members not reaching the appropriate target audience	Failure to reach the widest audience (so to provide all disabled 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			0		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 (recruitment process currently scrutinised) 2) Adopt a 'positive action' approach 3) Pro actively marketing of the Authority		Independent members' recruitment process to start in April 2010.

4	Failure to seize the opportunities embodied in the Disability 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) disability 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				0		1) CDRPs - all partners are subject to the general duty 2) Commitment to Disability 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 3) Add equality focus to partnership review to be undertaken		
1	Damage to Authority's reputation due to unequal opportunity for disabled people in recruitment / appointment processes	If the Authority's recruitment / appointment processes for members, officers or the Force's Chief Officers are, for whatever reason, providing unequal opportunity to disabled people, which might be explained as the Authority's disregard for disability equality principles and a lack of desire to represent its communities.	Reputational	Lack of trust & confidence in the Police Authority. Lack of a disability equality focused approach in the Police Authority. Authority is not representative of its communities.				0		1) Wide reaching recruitment campaigns 2) HMIC, Home Office & 'appropriate others' involvement with members' processes 3) 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		
1	Unequal opportunity for disabled people in the appointment of senior police officers	The Constabulary's Chief Officers Group is not accessible (in its widest terms) to disabled people.	Reputational	Lack of trust and confidence in the Police Authority. Bad publicity. Lack of proportionate balance / approach in Constabulary Chief Officers Group.				0		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 and awareness of accessibility in its widest context (to include more than 'just' physical access)		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 Disability Equality Scheme strategy	Failure by the Authority to positively act on the Disability 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 disability 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.			0		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 & Equality working group chair	Planning 'how' to mainstream disability equality into our day to day business - agree a system to ensure all reviews, work and reports are Equality & Diversity compliant incl. Committee papers		Building all 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.
4	Failure by the Force to implement / champion its Disability Equality Scheme strategy	Failure by the Force to positively act on the Disability 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 disability 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.			0		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 the Strategic IAGs 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 & Equality working group chair	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)		

4	Failure to measure / scrutinise / hold the Force accountable for its performance around disability equality	Failure by the Authority to ensure that the Force acts positively on and is held accountable to the Disability Equality Scheme (including complaints in relation to Disability Equality)	Compliance / Reputational / Strategic / Operational	Lack of trust and confidence in the Police Authority. Constabulary performance and service delivery negatively affected.			0		1) Relevant Police Authority Committees & Diversity & Equality Working 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 the Strategic IAG 4) Regular meetings between the Chief Officers Group and Police Authority 5) Improved governance structure in Force 6) Chief Officer holds national Race & Diversity Portfolio	1) Chairman of the HR Committee 2) Diversity & Equality working group chair 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, training and creating an environment where voluntary declarations are seen as positive) (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	
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.			0		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) Disability 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.	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.			0		1) On going audit and impact assessments of all policies, practices and functions 2) Relevant Police Authority Committee & Diversity+Equality Working group providing scrutiny and asking for progress updates 2) APA Monitoring	Chief Executive of the Authority & Diversity & Equality Working Group Chair	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		
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.			0		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) Diversity & Equality 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		
1	Recruitment advertisement for officers not reaching the appropriate target audience	Failure to reach the widest audience (so to provide disabled people in our communities 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			0		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		
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.			0		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		
4	Failure to seize the opportunities embodied in the Disability Equality Scheme during procurement processes	Failure to build in the relevant disability 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			0		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		

References:

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