

OPCC equality strategy 2026-29

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1. Introduction

The Police and Crime Commissioner has been elected by the people of Devon, Cornwall and the Isles of Scilly to be the voice of the people in policing, and on their behalf, to hold the Chief Constable to account. The Commissioner is responsible for the totality of policing.

As a public sector organisation, the Office of the Police and Crime Commissioner (OPCC) is led by its Chief Executive Officer, who has a legal obligation to consider how to achieve equality for all individuals when carrying out the functions of the office. The Commissioner and her office are required to *'have due regard to certain equality considerations when exercising their functions, like making decision in shaping policy and delivering services'* (Gov.uk).

The OPCC is committed to meeting both this requirement, and the requirements detailed in the Equality Act 2010. This strategy sets out the approach Devon and Cornwall's OPCC will take to meet these important, legal requirements.

2. Context

The Equality Act 2010 ('the Act') protects people from discrimination both in the workplace and in wider society.

On 5 April 2011, the Public Sector Equality Duty (PSED or 'the Duty') came into force. This requires public sector bodies to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The Duty covers the following nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

- Race
- Religion or belief
- Sex
- Sexual orientation

The Duty also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

The Duty is designed to reduce bureaucracy while ensuring public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all.

The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Under the requirements of the Duty, the OPCC, as an organisation with fewer than 150 employees is required to:

1. Publish one or more equality objectives at least every 4 years
2. Publish information on general duty compliance with regard to people affected by policies and practices every year.

3. The Commissioner's equality objectives

The Commissioner is committed to upholding equality, not only as prescribed under the Duty, but further to it. The Commissioner has committed to:

1. Always demonstrating a personal commitment to upholding equality.
2. Always acting in line with the Nolan Principles of Public Life.
3. Ensuring matters of diversity, equality and inclusivity are given appropriate consideration and weight in everything that her office does.
4. Holding the Chief Constable of Devon and Cornwall Police to account on equality issues within Devon and Cornwall Police, both internally and in external engagements with partners, stakeholders and most importantly, the public.
5. Ensuring services provided, funded, contracted or commissioned by the OPCC strive to meet the needs of everyone in Devon, Cornwall and the Isles of Scilly, and that these services are accessible to all.

4. Delivering the objectives

4.1 Upholding equality

On her appointment, the Commissioner signed a Code of Conduct, which outlines how she will behave when carrying out her role, in accordance with the Nolan Principles of Public Life at all times. The Nolan Principles are seven principles that guide the ethical conduct of public servants. The seven Principles are:

- Selflessness
- Integrity

- Objectivity
- Accountability
- Openness
- Honesty
- Leadership.

The Principles aim to foster an ethical culture and legitimacy in public services and are described as ‘a guiding light’ for how to approach activities, helping to ensure transparency and equality for all. In addition to this, all OPCC staff are required to sign and adhere to a local Code of Conduct, which provides further, local detail of what is expected of staff.

The Commissioner is directly able to influence the Public Sector Equality Duty as an office holder, as well as through the activities of the OPCC undertaken in her name. When developing policies or programmes of activity, the OPCC will ensure that equality matters are considered and that individuals needs and interests are appropriately reflected.

The Equality Act 2010 applies to protected characteristics of individuals, rather than groups of people, and as such it is vital that all decision makers consider or engage with affected individuals, actual or potential, when developing plans, or delivering activities or services.

As the person elected by the communities to represent them, the Commissioner has a position in the community whose voice can have a significant, positive influence. Through the delivery of her Police and Crime plan – developed in conjunction with the views of the public – and its communications strategy, the Commissioner and her office play an important role in the South West in fostering good relations and improving community cohesion.

4.2 Ensuring matters of diversity, equality and inclusivity are given appropriate consideration and weight by her office

Recruitment

We want our organisation to be both diverse and inclusive, and to represent the communities who we work for. We want to secure and benefit from the best talent, who can bring something to our mission and purpose. To achieve this, we ensure that our recruitment activity is targeted when necessary, far-reaching when appropriate, and always inclusive. We:

- Share recruitment opportunities far and wide when appropriate, through different media and social media channels
- Publish our policies and procedures on the website so individuals can understand what it is like to work here and how we fulfil our obligations
- We make clear that that we are a supportive employer, and provide all appropriate advice and support during recruitment exercises, and are aware that minority groups are less likely to apply for a role if they are unsure whether they meet the full criteria.
- Offer a guaranteed interview to those with a declared disability who meet the essential criteria

Employees

We want all employees to be proud of working for the OPCC, to enjoy their work, and do the best that they can. We endeavour to create an environment in which every employee is able to contribute meaningfully and to reach their potential.

We will:

- Ensure the physical office is a good environment, fit for purpose and where all staff have access to the tools and equipment needed to do their job.
- Create agile working policies to ensure that people are able to balance their work with their home life.

- Be transparent with policies and procedures so people know what they are entitled to and how to access it, or request it.
- Publish information on where to get support (such as from the employee assistance programme), or other sources of help.
- Encourage staff to engage with force staff networks, many of which support protected characteristics.
- Ensure that we are clear about how to support colleagues with disabilities, and work with individuals to develop and agree plans to meet individual requirements and make reasonable adjustments.
- Ensure that we accommodate religious requirements and are sensitive to specific needs at appropriate times in the year, including whenever practicable helping individuals take annual leave in line with religious observance.

Volunteers and independent people, including ICVs

The OPCC operates a number volunteer and independent schemes, and strives to provide all volunteers with high quality, accessible training, and to support volunteers at all times. The OPCC seeks to develop an in-depth understanding for volunteers of the needs of communities across Devon, Cornwall and the Isles of Scilly, and capture the voices of the individuals who volunteers may come into contact with, to ensure that they provide the best service possible to all members of society. Volunteers are required to undertake initial training before they commence their work, as well as further, regular training to need and are required to commit to ensuring that their own practices are inclusive.

Volunteers that are part of our Independent Custody Visitors' scheme ('ICVs') have a specific role in ensuring that police custody provides equitable treatment for all, and that detainees are treated respectfully with protected characteristics and any associated needs taken into full account. Our ICVs are empowered to check, challenge and report any inappropriate or discriminatory behaviour arising within the custody environment, and the OPCC has established processes to escalate any matter arising.

We will:

- Work hard to attract and retain volunteers that reflect our diverse communities.
- Ensure equality of opportunity for all volunteers throughout every stage of employment; from recruitment, retention and exit from service.
- Recognise the needs of diverse groups within our volunteer workforce and ensure appropriate support is available.
- Provide training to increase the knowledge and confidence of all volunteers on issues relating to equality, diversity and inclusion.
- Include the relevant parts of this strategy into all staff and volunteer handbooks and guidance notes where appropriate.
- Cultivate an inclusive culture where all individuals are treated with fairness, dignity and respect.
- Recognise, challenge and effectively address any inappropriate behaviour, language or dignity at work issues that may arise.

4.3 Holding the Chief Constable to account on equality issues

The Commissioner will hold the Chief Constable to account for the delivery of an effective and efficient police service, including the exercising of all duties relating to equality, diversity and inclusion. This includes monitoring all force activity to ensure effective compliance with the Equality Act, and all further matters related to equality and diversity.

To achieve this, the Commissioner will:

- Seek evidence to ensure appropriate protocols and policies are in place, that embrace diversity, providing fair and responsive services.
- Ensure effective monitoring of the workforce, including evidence that the force is striving to be representative of the communities served, providing an inclusive working environment and ensuring all staff have equality of opportunity to develop their potential.
- Continually review efforts through targeted intelligence gathering and analysis with the Chief Constable to promote a culture of continuous improvement to deliver better services to both our communities and the workforce.
- Ensure the Chief Constable has a coherent vision of equality that sits within the wider business framework, and is shared and owned by the force leaders, and wider workforce.

4.4 Engaging with diverse communities

The Commissioner will engage with all communities across Devon, Cornwall and the Scilly. The Commissioner provides a wide range of community engagement activities each year, and also provides a range of opportunities for people to engage with the OPCC via social media or via traditional routes. The Commissioner also ensures that the Chief Constable and their teams ensure that they actively engage with all communities across the two counties and island.

4.5 Ensuring services meet the needs of communities and are accessible

The OPCC provides funding for a wide range of services to support victims and reduce reoffending. The details of how this funding is allocated is published annually in a Strategic Investment Plan (formerly the Commissioning Intentions Plan). The Commissioner ensures that all services for victims of crime are free at the point of delivery. Should service providers be unable to meet the specific needs of people with protected characteristics, then separate services are funded to ensure equality of access.

Individuals make contact with the OPCC in a variety of ways and for a variety of reasons. Members of the public can make contact with the OPCC by telephone, in writing or by e-services. People can also access information about the OPCC through the website and other social media channels.

Although a small organisation, the width and breadth of activity undertaken by the OPCC is far reaching, and as such it is vital that that individuals can access the information they require, however complex it is, without difficulty. The OPCC's website and other communication channels are developed alongside an approach to communications that is committed to the use of plain English and clear explanations. The layout of the website is continually under review to ensure that relevant information is most easily accessible, and the information that we must legally publish is available and up to date.

The provision of accessible communications, including Easy Read publications and ensuring the OPCC website is accessible to those with different needs, is a priority. All documents produced in print and digitally by the OPCC's Communications and Public Affairs team have been designed to meet 'Web Content Accessibility Guidelines', including being written in simple language and structure, in accessible format such as 'HTML'. Wherever possible, online documents are created using headings compatible with screen readers, with large font size and high colour contrast appropriate for those with impaired vision.

The OPCC website was redesigned in 2024 to improve accessibility, and work has been commissioned to ensure the website meets requirements under the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

This means that people can have timely, direct access to information, without the need for making personal contact. As such, it is important that information is organised appropriately, with out-of-date information amended or removed as soon as possible.

We expect a high standard of customer service and train staff to be able to communicate effectively, anticipating the needs of the individual where possible. We receive a high volume of correspondence that needs to be redirected to the force or for which a standard response is appropriate, and template responses have been drafted to present information clearly and concisely.

People also make contact with the OPCC to express dissatisfaction with, or formally complain about, the police. In these cases, it is important that staff listen carefully to individuals to understand what is being provided and what is being sought. Staff must consider individual communication needs, and seek to understand what is important to them, even if it is not immediately obvious. Some individuals have difficulties with written communication, even with the use of assistive technologies, and sometimes require specific accommodations (such as coloured paper or specific spacing or font sizes). In these incidents, OPCC staff are expected to assist individuals in all reasonable and proportionate ways to enable them to communicate effectively. Examples of this may include offering to make information available in a different format, or arranging a video call or structured telephone call.

In some instances, it may be appropriate for the Commissioner to meet the individual as part of her planned case work surgeries.

As the owner of the policing estate, the OPCC also has a responsibility regarding physical access to police stations and buildings across Devon, Cornwall and the Isles of Scilly. Any concerns raised to the OPCC by the public regarding properties, buildings or estates should be raised with the Estates team.

The Commissioner is committed to ensuring that police buildings are accessible by all, and to providing appropriate disability access for visitors to all public facing offices and police stations, with legal responsibilities seen as the minimum standard to achieve.

5. Decision-making

The Commissioner, Chief Executive Officer (Head of Paid Service) and Treasurer (Chief Finance Officer) have a number of formal decision-making responsibilities, including formal decisions as part of their statutory duties, and in compliance with the Corporate Governance Framework.

The Duty cannot usually be delegated, however all OPCC staff should ensure that the Commissioner and her statutory officers have all the information needed before decisions are finalised. Whenever appropriate, the Commissioner will take advice regarding key decisions from the Chief Executive Officer and/or Treasurer.

In addition to the formal decisions required of the Commissioner and statutory officers, all staff make decisions as part of their work. Everyone must therefore be aware of the requirements of the Duty and consider the impact of decisions and activities upon individuals.

When making decisions we must have due regard to the need to eliminate conduct prohibited by the Duty, advance equality of opportunity, and foster good relations. The level of 'due regard' considered sufficient in any particular context depends on the facts and the Duty will be applied in a proportionate way depending on the circumstances of the case and the seriousness of the potential equality impacts on those with protected characteristics.

In advance of making a decision, we will determine how much weight should be given to the various factors informing the decision. The Duty does not mean that in some situations, decisions cannot be taken which disadvantage some people (provided this does not constitute

unlawful discrimination), but the decision-maker should be aware of the equality impacts of these decisions and consider how they could positively contribute to the advancement of equality and good relations.

The decision-maker should consider ways of preventing or balancing the effects that their decision may have on certain groups. They should decide which mitigations, if any, they might want to put into place. The mitigation should be reasonable and proportionate to the issue at hand.

The Duty requires decision-makers to understand and take account of the consequences of their choices, having due regard to the aim of eliminating conduct prohibited by the Act, advancing equality of opportunity and fostering good relations.

We understand that making decisions without having due regard to the Duty can be unlawful.

As part of the decision-making process, OPCC staff should record what equality impact assessments have been undertaken.

6. Supporting staff and volunteers to deliver the Public Sector Equality Duty

We will ensure that staff and where appropriate, volunteers, have the knowledge and skills to be able to deliver the requirements of the Duty. We will do this by:

- Delivering a broad programme of training, including:
 - Developing general knowledge of the protected characteristics, such as information about disabilities and faith
 - Customer service skills, including matters of diversity and equality
- Ensuring we are up to date in respect of developments in equality, diversity and inclusion
- Ensuring templates and forms encourage consideration of equalities matters in day-to-day activity
- Providing guidance and templates for equality assessments
- Ensuring equality impacts are considered as standard in all policies, projects and activities
- Creating an approach to learning lessons where we could do better
- Participating in audits and surveys, etc as appropriate

An Equality Impact Assessment (EIA) must be completed for all significant projects, policies or activities, and when there is a risk of a higher impact on some groups. Staff should seek advice from their line manager about whether their work requires an assessment. Further advice is available via the government website at:

[Public Sector Equality Duty: guidance for public authorities - GOV.UK](https://www.gov.uk/guidance/public-sector-equality-duty-guidance-for-public-authorities)

In work that does not require an EIA, staff should be able to demonstrate their considerations about the impact of the work that is being done. In order to meet the requirements of the duty it is important to consider the equality implications when making decisions. The following questions may assist in making an assessment of the impact of the work:

- Does this work affect people? How? What sort of people? (e.g. a new staff policy, funding a project)
- Have you considered the nine protected characteristics?
- Have you consulted people with specialist knowledge?
- How can we make sure communication about this work is accessible to all?
- Will the work create any problems or barriers to any community or group?
- Will any group be excluded because of the work?
- Will the work have a negative impact on community relations?

- How is the work likely to affect the promotion of equality and the elimination of discrimination in each of the areas? What is the evidence?
- How can you mitigate impacts on individuals or how should you work harder to ensure all views are heard?

7. Monitoring compliance

The OPCC will be transparent in its meeting of its Public Sector Equality Duty obligations, in particular with regard to publication of equality objectives, and demonstration of wider compliance with the Duty.

We will do this by:

- Ensuring this strategy is reviewed every two years.
- Reviewing and renewing the Commissioner's equality objectives every four years.
- Collating information about Act compliance, with a Public Sector Equality Duty annual report detailing compliance and activity published every year.
- Having Equality Impact Assessments and Decision Notices as a standing item on the weekly OPCC Senior Leadership Team meeting agenda.
- Maintaining formal internal oversight via the OPCC's Executive Leadership Board.

Fran HUGHES

OPCC Chief Executive Officer

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