

NATIONAL PROBATION SERVICE HAMPSHIRE AREA

EQUALITY IMPACT ASSESSMENT

Section Two: Full Impact Assessment

This “Equality Impact Assessment” documents the outcome of a full impact assessment on the specified function, policy or procedure, addressing the equalities strands of: Race, Gender, Disability, Sexuality, Faith and Age. It is to be completed, published as specified, and appended to policy and/or strategy documents.

1. Function Name, Policy or Procedure:

Approved Premises (this is a reviewed impact assessment, updating previous assessment in 2004)

2. Aims and Approach of Function/Policy/Procedure

There are three Approved Premises (AP's) in the Hampshire Area, located at Purbrook, Southampton and Fareham, delivering enhanced supervision to high risk offenders. Approved Premises have been defined as:

“..... a criminal justice facility where offenders reside for the purposes of assessment, supervision and management, in the interests of protecting the public, reducing re-offending and promoting rehabilitation”.

The aims of Approved Premises have been laid out in PC 37/2005 as summarised below:

As defined in Section 9 of the Criminal Justice and Court Services Act 2000, Approved Premises are primarily intended for:

- Defendants on bail in criminal proceedings
- Offenders serving community sentences with a condition of residence

➤ Offenders on post-custodial licences with a condition of residence

Exceptionally, and with the approval of the Secretary of State, the Chief Officer or someone acting on their behalf, they can also accommodate voluntary residents where it is considered that residence in Approved Premises is necessary:

- For the protection of the public, and/or
- To enable the offender to receive supervision or treatment

The functions of Approved Premises are to:

- Contribute to the protection of the public from those who pose the most serious risk of harm
- Contribute to the assessment of offenders using OASys and other approved assessment tools
- Contribute to the delivery of risk management plans, including those agreed within the Multi-Agency Public Protection Arrangements (MAPPA)
- Provide a regime of 'enhanced supervision', together with other measures when necessary, in the interests of public protection
- Provide a planned, structured regime of interventions, including one-to-one key working, derived from the offender manager's sentence/supervision plan and underpinned by pro-social modelling and motivational principles
- Address residents' criminogenic needs in order to reduce the likelihood of further serious offending
- Provide a safe and secure environment for residents and staff
- Contribute to the enforcement of Court orders and licences including, where appropriate, action to initiate or support recall to prison
- Deliver or contribute to the delivery of effective treatment programmes, including relapse prevention work
- Coordinate delivery of a range of services (to include health, education, life skills, employment and resettlement services) in the interests of effective rehabilitation as determined by the offender manager's sentence/supervision plan
- Undertake bail assessments, where the defendant poses a significant risk of harm to others, and facilitate other specialist assessments in order to enable firm sentencing proposals to be offered to the Courts
- Promote safe and timely move-on to suitable next-phase accommodation provision
- Provide facilities and regimes that are accessible to all relevant offender groups and cater for the diverse needs of all residents

Offenders are referred to Approved Premises and assessed for suitability against a defined set of criteria linked to risk. Diversity information is collected as part of the assessment process to inform appropriate provision rather than to influence

acceptance decisions, although in some circumstances where there are risk issues to be addressed these may inform acceptance decisions e.g. a very young offender being referred to a hostel with a group of older residents. There are currently no AP's which offer facilities to female offenders in Hampshire, which is due to National Policy that AP's are not mixed. Each AP has an adapted room for a resident with mobility problems and accessibility has been addressed around a wide range of disabilities. The premises were audited in 2004 for DDA compliance and any remaining adaptations required put in place. An AP Diversity Strategy was written a number of years ago which has provided the framework through which a range of diversity issues are integrated into practice. This Strategy is now due for review.

3. What data/information is available & does it suggest differential impact for any of the groups identified as part of the impact assessment process?

(A range of different data may be used for this section – e.g. internal monitoring data, national reports/research, locally commissioned reports/audits/research, results of previous consultations/workshops, statistical data such as census data, Home Office Statistics)

An Internal Audit was undertaken on all 3 approved premises in September 2007, part of which was to measure against the Diversity and Maximising Diversity Standard. (criterion listed below) . Two of the hostels were audited as having fully met the standard and one as almost meeting with one action point to address.

Evidence of how the criterion will be met:

- Approved Premises are explicitly included in the Area Diversity Plan.
- Approved Premises have their own annual Diversity Plan.
- All staff receive training in diversity.
- Diversity objectives are set in appraisals
- Approved Premises provide data on admissions and departures based on race, ethnicity, gender and disability.
- Provision of meals to cover all dietary needs.
- Access to interpreting and translation services.
- Staffing profile of Approved Premises in relation to resident group. A sufficient range of interventions are available to ensure broad access to the residents.
- Regular consultation with women, black and minority ethnic and offenders with disabilities over potential opportunities to maximise inclusion.
- Offender feedback questionnaires, broken down by race and gender, used to demonstrate to offenders that Approved Premises develop its policies based on their feedback. Completion of any Race Equality Impact Assessments.
- Process for dealing with complaints exists and is public.
- Reports on the usage of the complaints procedure

Race: Data generated for the annual diversity report shows a trend of minority ethnic offenders having good representation in referral and acceptance for HPA's approved premises and higher levels of successful completion than white offenders.

Gender (including transgender): There is no longer any provision for female offenders within HPA's approved premises, following on from National policy that AP's are not mixed. When an offender is transgender each case is looked at individually but the general approach is that the offender would have to live as a man.

Disability: Each AP has an adapted room for a resident with mobility problems but there is currently no data to consider in terms of outcomes for the full range of disabilities

Sexuality: Information is collected on sexuality as part of making sure diverse needs are addressed within the hostel setting, but no outcome data is available in terms of sexuality.

Religion or Belief: As above

Age: As above

If there are gaps in data provision how are these to be addressed in order to inform a full EIA?

Needs to be an increase in monitoring capacity in terms of other diversity issues for referrals, acceptance and successful completion of AP residency

4. What consultation has been undertaken and with whom?
(include information on what was needed from the consultation, how it was carried out and with whom)

Diversity Adviser, Equalities Consultation Panel, Offender Feedback and House Panels.

5. What are the main findings of the consultation undertaken (what positive or negative impacts were identified for any of the different groups)?

No concerns have been raised in terms of negative impact or in relation to the approach to integrate diversity into all AP practice.

6. Does this policy have the potential to cause unlawful discrimination, exclusion of some groups of people from its benefits or lead to negative relations?

Aside from the exclusion of women offenders from its provision, there have not been any discriminatory or negative impacts identified.

7. What measures have been identified in order for the policy/procedures to achieve its aims without risking any adverse impact?

Because the Diversity Strategy has been in place for a number of years, it has been felt that a new system of annual diversity planning for AP's would be valuable and for further offender data to be gathered as an evaluative mechanisms.

8. What action is now to be undertaken?

An annual Diversity Plan to be produced specifically for AP's
Offender feedback questionnaire to be reviewed, amending questions as required and issuing of the questionnaire at two stages; induction and twice a year to all residents (January and July)
Results will be collected, collated and analysed to identify and strategic operational changes
Link strategy for local groups/facilities i.e. libraries, church groups, gyms etc

9. Monitoring arrangements and review process

Monitoring of AP's outcomes to be undertaken by race and disability and contained within annual Diversity Report. In addition analysis of offender questionnaires to be segmented by race and disability.

10. How results will be published

All results are published on HPA's intranet and Website

.

Signature of Policy Lead

Position

Date **April 2008**