

David Jackson
Director of Community Engagement
Community Engagement Branch
NI Policing Board
Waterside Tower
31 Clarendon Road
Clarendon Dock
Belfast
BT1 3BG

9th May 2008

Dear David

Re: Review of the Policing Board's Community Engagement Strategy

Many thanks for inviting the Committee on the Administration of Justice (CAJ) to contribute to the consultation on the above-named strategy, and apologies for the slight delay in our response. As the specific questions asked under each section do not sufficiently cover all the points we would like to address, we will instead provide general comments on each section.

Sections 1

In response to the specific question asked CAJ is of the view that the overall aims provide a sound basis for an effective community engagement strategy.

Section 2

This section makes reference to consultation, but we find it surprising that no reference is made in this context to Section 75 of the Northern Ireland Act, which is the statutory source for the duty to consult. As such we believe there should be specific reference to this duty, and to the key elements of the Board's equality scheme that give effect to this duty.

Section 3

Section 3.1 lists the groups that the strategy has identified, yet an examination of the actual strategy in annex 1 does not actually mention these groups. Perhaps some more information could be given on how these groups were chosen, the rationale for including these and excluding others etc? How will the strategy incorporate "overarching groups" who have an interest in community engagement but do not fit

exactly into one of these groups, or perhaps fit into them all? For example, the rural sector is an all-encompassing one which will have connections to all the groups listed, as well as having issues in its own right.

In addition, the Board acknowledges that rarely is an individual solely a member of just one of these groups. CAJ welcomes this acknowledgement, but respectfully suggests that having made the acknowledgement, the document should go further and explain what mechanisms will be put in place to deal with this multiple-identity issue. Listing and separating groups in such a way risks missing out on important connections between various groups and identities.

We are also quite surprised to see the business community listed as a group for the purposes of community engagement. The term community engagement tends to suggest engagement at a community level, and indeed the first page of the original strategy talks of “*consultation with the community and hard to reach groups.*” The business community are rarely seen as “*hard to reach*” and while we totally accept that they have an important role to play and it is key that they have their say on policing issues, perhaps a strategy that focuses on engagement at community level is not the best way of addressing this.

Section 4

CAJ would have further concerns that the isolation of the sectors identified into their own individual reference groups risks further polarising the issues, and as such we reiterate the recommendation that more consideration be given to mechanisms for addressing multiple-identity and cross-cutting concerns so as to allow more efficient and effective engagement. For example, could a forum be devised for bringing the various groups together on a regular basis? At the very least, the Board must ensure that those who may be identified as fitting into one group not be denied the opportunity to attend other groups should they so wish (so, for example, groups working with disabled people should be invited to and able to attend other reference groups given that people with a disability are also a mixture of young and old, male and female etc). In addition, some mechanism for facilitating the participation of more generalist groups in any or all of the reference groups must be found.

As regards the purpose of reference groups, while agreeing with the general thrust of this, we are surprised that there is little cross-reference to the overall aims of the community engagement strategy, particularly if - as it appears - these groups are to be the mainstay of the strategy. Indeed, there is a lot of focus on how these groups can help the Board, as opposed to how the Board can help these groups to engage more effectively with the police and thereby build confidence.

We are also disappointed that more information or ideas are not given in relation to how it is intended to engage with Republican and Loyalist communities. Engaging with these groups at a very local community level will be key to any successful community engagement strategy in terms of building confidence in the police.

As regards awareness-raising events, it is very important that the Board carry out such events, and these should of course be included in any community engagement strategy. However an examination of annex 2 and the events listed therein gave CAJ

some cause for concern. For example, there is no mention in any of the youth consultation events of the involvement of non-governmental groups like Children's Law Centre and Include Youth who work directly with young people on issues of criminal justice and policing; the fact that there is no mention whatsoever of women's groups in relation to the women's events is striking; a meeting of police authorities from the north west region of the UK or visiting delegations from Pakistan and Kazakhstan cannot in our view be categorised as events concerned with engaging the community of Northern Ireland.

We are also disappointed that the document does not elaborate on the role to be played by DPPs and in particular what the mechanisms of interaction, if any, will be between the reference groups and the DPPs. As the document acknowledges, DPPs have a responsibility to engage with the community, and as such they should feature centrally in the Board's community engagement strategy. They will also be particularly important in terms of engagement with very local communities. It is important that the work of the Board's community engagement strategy does not in anyway undercut or indeed duplicate the role of DPPs but that mechanisms of co-ordination and co-operation are found. We would be interested in receiving any further information that might become available in this regard.

Section 5

As regards, consultation prior to drafting the policy, we are aware of a review being carried out by KPMG on community engagement but are surprised to see no reference to it here? In terms of process, it may have been useful to feed the results of this review into the current process (for the record, CAJ had asked to participate in one of the focus groups being carried out by KPMG but never received an invitation. When we followed this up with them, they expressed their understanding that we had been contacted, but this did not in fact happen, which was very disappointing to us).

The framework for future strategy seems to us to provide a sound basis on which the work should proceed. However, we would like to highlight one particular issue that we believe is central to building confidence, namely point 5 regarding communities and groups wishing to see how their views are affecting policing. Confidence in the process will rapidly be lost if groups and communities feel they are being engaged in a technical process of consultation and engagement that does not genuinely allow them to impact upon policing. As such, we would urge the Board to ensure that the framework for delivering on this is robust and genuine.

We would be interested in receiving further information on how the strategy "*was developed and implemented in line with the Board's responsibilities under Section 75 of the Northern Ireland Act.*" In light of the statement in the cover letter of the strategy to the effect that "*when the revised strategy is available consideration will be given to equality screening of this policy and whether an EQIA is necessary*" we would have to presume that in fact the strategy was not developed and implemented in line with the Board's responsibilities under Section 75. If it had been, a screening process would have been carried out at a much earlier stage; it would - in our view - have identified differential impacts across the nine grounds; and as such would have indicated the need for an EQIA. The purpose of the statutory equality duty is to substantively inform a policy as it is being developed, it is not a technical exercise to

be carried out at the end. We therefore believe that if the Board is not to find itself in breach of its statutory duty, an equality screening exercise should be carried out as a matter of priority. We look forward to being consulted in this regard.

We hope you find this contribution useful and are happy to meet to discuss it further.

Yours sincerely

Aideen Gilmore
Deputy Director