



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Response Date: 09/06/2026

2026/548 - Accessibility and Reasonable Adjustments

In response to your recent request for information regarding;

I am writing to you under the Freedom of Information Act 2000 to request specific information relating to the processing of fixed penalty notices and the provision of reasonable adjustments for disabled members of the public.

Please provide the following:

1. Reasonable Adjustment Policies

Please provide copies of all current policies, guidance and standard operating procedures used by North Wales Police (including the Safety Camera Unit) regarding the provision of reasonable adjustments for disabled members of the public who are in receipt of a Notice of Intended Prosecution (NIP) or Fixed Penalty Notice (FPN).

If this involves multiple units or departments, please include all relevant policies and confirm which units or departments are responsible for implementing reasonable adjustments in the context of traffic enforcement and fixed penalties.

There is no operating policy for the Safety Camera Process Unit alone.

Please see the attached Joint Strategy which includes links to Section 149 and the Equality Act 2010

2. Workplace Adjustment Passport

Please confirm whether North Wales Police has implemented a "Workplace Adjustment Passport" or equivalent system for recording disability-related adjustments, as previously recommended by the Independent Office for Police Conduct (IOPC). If so, please confirm whether any equivalent process exists for recording reasonable adjustments provided to members of the public, and provide copies of any relevant templates, guidance or governance documentation.

The Force does have Workplace Adjustment Passports and any request from the public for reasonable adjustments will be actioned on a case-by-case basis

3. Contracting and Training

Please confirm:

- **Whether any third-party contractors are involved in the processing of NIPs or FPNs for North Wales Police Safety Camera Unit.**

No

- **What training (if any) is provided to Safety Camera Unit staff on:**

Induction Training when commencing a role includes these areas along with mandatory training packages that are circulated for completion by staff member

Pencadlys yr Heddlu,
Glan-y-Don, Bae Colwyn LL29 8AW
www.heddlugogleddcymru.police.uk

Police Headquarters,
Glan-y-Don, Colwyn Bay LL29 8AW
www.northwales.police.uk

**Yn gwneud Gogledd Cymru'r lle mwyaf diogel i fyw, gweithio ac ymweld yn y DU
Making North Wales the safest place to live, work and visit in the UK**

- **The Equality Act 2010, in particular sections 20 (reasonable adjustments) and 149 (Public Sector Equality Duty);**
- **The anticipatory nature of the duty to make reasonable adjustments;**
- **Making reasonable adjustments for disabled people with mobility impairments and dyslexia;**
- **Recording and documenting disability-related requests and adjustments provided.**

4. Accessible Formats

Please confirm whether the Safety Camera Unit has a process for providing evidence (including any video footage, photographs or written documentation) in accessible formats for disabled people who cannot use PDFs or standard online forms. If so, please provide details of that process.

We will tailor the response to the needs of the person making the request

5. Disability Equality Impact Assessments

Please provide copies of any Disability Equality Impact Assessments (DEIAs), equality analysis, or similar assessments that the Safety Camera Unit (or North Wales Police more broadly) has carried out in relation to:

- **The processing of NIPs and FPNs;**
- **The accessibility of its website, online forms, and document delivery systems;**
- **The provision of reasonable adjustments for disabled people (including those with mobility impairments and dyslexia).**

If no such assessments have been carried out, please confirm this and provide an explanation of how the Unit otherwise fulfils its anticipatory duty under section 20 of the Equality Act 2010 – specifically, how it would know in advance what particular barriers may cause inaccessibility for disabled members of the public, without having conducted any Equality Impact Assessments (DEIAs) or equivalent Equality Analysis.

The wording on our NIPs and FPNs are taken from the National templates.

Reasonable adjustments can be made when the department is notified.

At this point, and once we are clear of the requirements, documentation can be made available in the format required. This also applies to the service we provide for example phone calls, translations and email formats.

The department is influenced and informed by the overall policy for the organisation which involves mandatory training.

6. Public Interest Test Guidance

Please provide copies of any guidance, policy or internal instructions used by North Wales Police or the Safety Camera Unit regarding the public interest test and the Public Sector Equality Duty (section 149 of the Equality Act 2010) in the context of offering fixed penalties to disabled people.

The staff in the Safety Camera Process Unit have delegated duties from the Chief Constable and are able to make such decisions applying the PI test in line with that of the Crown Prosecution Service

[The Code for Crown Prosecutors | The Crown Prosecution Service](#)

When making decisions, prosecutors must be fair and objective. They must not let any personal views about the ethnic or national origin, gender, disability, age, religion or belief, sexual orientation or gender identity of the suspect, defendant, victim or any witness influence their decisions. Neither must they be motivated by political considerations. Prosecutors must always act in the interests of justice and not solely for the purpose of obtaining a conviction.

Prosecutors should also have regard to whether the suspect is, or was at the time of the offence, affected by any significant mental or physical ill health or disability, as in some circumstances this may mean that it is less likely that a prosecution is required. However, prosecutors will also need to consider how serious the offence was, whether the suspect is likely to re-offend and the need to safeguard the public or those providing care to such persons.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 05/06/2026



Joint Strategic Equality Plan 2023-2027

.....

A Joint Plan of the
Office of the Police and Crime
Commissioner for North Wales
and North Wales Police



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

SWYDDFA COMISIYNYDD HEDDLU
A THROSEDD GOGLEDD CYMRU



OFFICE OF THE POLICE & CRIME
COMMISSIONER NORTH WALES

Contents

.....

Foreword	3
1. Introduction	5
2. North Wales	7
3. Our Aim	8
4. Specific Duties in Wales	9
5. The Welsh Language	10
6. National Plans in Context	11
6.1 Welsh Government	11
6.2 National Policing Plans	11
7. How we Developed Our Objectives	13
8. Our Objectives	15
9. How We Will Deliver	16

Foreword by the Police and Crime Commissioner and Chief Constable

Welcome to the North Wales Police and North Wales Police and Crime Commissioner's Joint Strategic Equality Plan 2023-2027. Equality, Diversity and Inclusion are vital elements in policing. This plan outlines how we will rise to meet the equality challenges we face in the coming years, including how we will meet our duties under the Equality Act 2010.

The police service cannot do its job without the trust and confidence of the public. We have to know and respect our communities to be able to offer an effective policing service. We police by consent. Services must therefore be delivered in a fair and consistent way, always upholding human rights. We train and equip our staff to do this, and we then monitor service delivery. We also work in partnership with groups and individuals from our communities, and actively listen to views and opinion from all sections of society about the issues that matter and our effectiveness in tackling them.

We serve diverse communities in North Wales and are committed to delivering a high-quality service to all. It is vital that our police officers and staff are able to engage with the different people in our communities to deliver a policing service appropriate to their needs. It is also important that those who work for us are reflective of the communities who live and work in North Wales. We are working hard to ensure our workforce is truly representative of those we serve.

In an ever-changing world, policing priorities adjust to meet the needs of the people in our communities over time. Although a great deal of planning and research goes into establishing policing priorities, the service must also be able to respond dynamically and effectively to issues that come to light.

Nationally we have seen the reputation of the police service damaged by horrific acts committed by serving police officers, as well as the poor standards of behaviour detailed in the [Operation Hotton Report](#). It has been important for North Wales Police to ensure its own staff and procedures are fit for purpose. Misogyny, violence against women, and sexual misconduct have no place in the police service. Our [report detailing how misconduct is being dealt with in North Wales](#) is available on the OPCC website. It has been important for us to demonstrate our local response to themes that may have arisen outside of North Wales.

We need to be active in understanding the behaviour and culture of the organisation and ensuring that it is appropriate and fit to serve the people. This plan details the work we have in place to understand our workforce and ensure a positive and transparent culture that operates with humility and integrity.

We strive to understand various types of crime and its impact on communities in North Wales. Ensuring all policing services are delivered fairly and appropriately is a key challenge for both the Force and the Commissioner. We will monitor performance against the equality plan and will regularly review and assess activity to ensure we are moving forward to improve equality.

We assure you that together, we will do our best to see that the people of North Wales are continually afforded an effective and efficient Police Service that meets the needs of all our communities.

We would like to thank everyone, both internally and externally, who has contributed to the development of this plan, and we will work diligently to ensure that both our organisations deliver on the goals set.



A handwritten signature in black ink, appearing to read 'Andy Dunbobbin'.

Andy Dunbobbin,
North Wales Police and
Crime Commissioner



A handwritten signature in black ink, appearing to read 'Amanda Blakeman'.

Amanda Blakeman,
Chief Constable
North Wales Police

1. Introduction

.....

This Strategic Equality Plan outlines our response to [Section 149](#) of the [Equality Act 2010](#) which sets out the General Duty, also known as the Public Sector Equality Duty. Under the Act the Commissioner and the Force must have due regard to the need to:

- a) *Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;*
- b) *Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- c) *Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

The specific duties imposed on the Force and the Commissioner as public bodies are to:

- Set equality objectives. These are milestones to aim towards that ensure improvements in equality performance and helps us to meet the general duties.
- Publish sufficient equality information to demonstrate compliance with the general equality duties.
- Include information on the effect of policy and practices on people who have a particular “protected characteristic” (this includes service users and employees).
- Evidence analysis of policy and practice and details of information considered.
- Provide details of engagement undertaken.
- Publish an annual report highlighting progress made during the year. This report must be produced by 31st March each year.

The protected characteristics referred to are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation



Although North Wales Police and the North Wales Police and Crime Commissioner are public bodies in Wales, policing is governed centrally by the Home Office. North Wales Police and the Police and Crime Commissioner are therefore legally bound by the specific duties that apply in England. These are slightly different to the specific duties set in Wales by the Welsh Government. However, we continue to work closely with other Welsh public bodies in the preparation and execution of our Plan and Equality Objectives and have set objectives that are consistent with the Welsh regulations.

2. North Wales

North Wales covers the counties of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham. It covers a diverse area including urban and rural areas, Snowdonia National Park, two ports, industrial regions and numerous towns, many of which attract high numbers of tourists during the summer months.

North Wales Police provides policing services to a population of 686,906¹ people and covers an area of 6,200 square kilometres. There are approximately 1,700 Police Officers, 200 Police Community Support Officers and 1,100 police staff.

North Wales Police and Crime Commissioner (“the Commissioner”) is one of 43 police and crime commissioners in England and Wales elected to oversee the work of the local police force. The Home Secretary directs policing nationally. The Commissioner along with Chief Officers are responsible for policing in North Wales.

The Commissioner ensures that North Wales Police Force is efficient and effective and seeks to improve performance and standards in the policing service delivered to North Wales’s communities. Part of the Commissioner’s role is to make sure local people have a say in how their area is policed and to hold the Chief Constable to account for services delivered.



¹ Census Maps - Census 2021 data interactive, ONS

3. Our Aim

The aim of this plan is to meet our legal duties. In doing this we aim to reduce or remove disadvantage, take steps to meet the needs of all people whether they share a protected characteristic or not, and encourage people with certain protected characteristics to participate in public life where they are underrepresented. Ultimately, we are seeking to advance the equality of opportunity for all and in doing so making North Wales the safest place to live, work and visit in the UK.



4. Specific Duties in Wales

.....

The Equality Act 2010 has specific duties to support the general duty. These specific duties can be different in Wales, England, and Scotland, resulting in different specific duties being set in each country.

In England, the Equality Act 2010 (Specific Duties) Regulations 2011 require public authorities to publish equality objectives and information to demonstrate compliance with the general equality duty. In Wales, the [Public Sector Equality Duty \(PSED\)](#) goes further and contains express provisions about engagement (Regulation 5) and equality impact assessments (Regulation 8).

Furthermore, in March 2021 the Welsh Government enacted the ‘Socio-economic Duty,’ which requires public sector bodies in Wales to work together to tackle the biggest driver of inequality in Wales, poverty.

As ‘non-devolved bodies,’ the Welsh Specific Duties and the Socio-economic duty do not apply to either the Force or the Office of the Police and Crime Commissioner; however, it is vital that in meeting our equality duties, we act in the spirit of the duty to support Welsh Government and our public sector partners in removing socio-economic disadvantage.

Paying due regard to this duty means that, when we make decisions of a strategic nature, we consider how best to deliver better outcomes for those who experience socio-economic disadvantage. As a result, due regard has been made to the Socio-economic Duty when identifying our objectives for 2023-2027.

5. The Welsh Language



North Wales Police and the Commissioner acknowledge the significance and importance of the Welsh language and bilingualism in the organisation. In its Welsh language strategies, it is recognised that the ability to speak Welsh is also a skill alongside other policing skills. A Welsh Language Skills Policy has been developed which contains initiatives to improve the bilingual capacity of the Force.

In accordance with duties under the Welsh Language Standards, the Force and the Commissioner have produced a [Joint Welsh Language Strategy](#). The Strategy which receives the approval of the Welsh Language Commissioner will also be revised in 2023. It contains commitments to develop as a bilingual organisation and to ensure language choice when providing services. This is supported by a Welsh language skills policy which contains initiatives to improve the bilingual capacity of the Force.

A Welsh Language Annual Monitoring Report is also produced each year to assess the progress of North Wales Police against the Welsh Language Standards. The report provides data to highlight the progress and performance of the Force in developing and promoting the Welsh language for the public of North Wales and the Force's staff. The Strategy reflects continuous commitment to upholding the Welsh Language Standards and details the steps taken to meet the legal duties they set out.

6. National Plans in Context

.....

The delivery of policing does not sit in isolation. Key parts of the public sector and wider criminal justice system impact significantly on policing and the effective delivery of policing services. To this end we need to understand the work of our partners to ensure the implementation of equality objectives does not sit in isolation of the work being carried out across Wales and the UK.

6.1 Welsh Government

The Welsh Government has its own [Strategic Equality Plan](#) that public bodies in Wales should bear in mind when designing their own objectives.

Within the planning cycle for setting our objectives we have also had regard to other legislation and Action Plans including the following

- [The Well-being of Future Generations \(Wales\) Act 2015](#)
- [Advancing gender equality Action Plan](#)
- [Anti-racist Wales Action Plan](#)
- [Learning Disability Strategic Action Plan](#)
- [LGBTQ+ Action Plan for Wales](#)

This is not an exhaustive list.

6.2 National Policing Plans

The past few years have been difficult in terms of ensuring public confidence in the police (and wider criminal justice system) for Black and Minority Ethnic people. The death of George Floyd in 2020 was a watershed moment worldwide. This brought a much-needed focus on how Black people are policed and experience the criminal justice system. We now have two significant action plans for policing with the express aim of ensuring fairer and more equitable outcomes for Black people affected by policing and the wider criminal justice system; these are:

NPCC Police Race Action Plan

The [NPCC Police Race Action Plan](#) was published in 2022 and sets out the specific measures to be taken by police forces to significantly improve fairness in the policing of Black people in England and Wales. In preparing this equality plan we have ensured that the relevant aspects of the Police Race Action Plan are considered to both avoid duplication of work and to ensure we do not miss or overlook relevant work within our plans that are local to North Wales.

Criminal Justice in Wales Anti-Racism Plan

The [CJIW Anti-Racism Plan](#) was published in November 2022 and is part of the Anti-Racist Wales Action Plan. This sets out specifically what the criminal justice partners in Wales will undertake to ensure the delivery of fairer and better outcomes for Black people experiencing the criminal justice system. North Wales Police and OPCC are members of the Anti-Racism Taskforce where we are working together with our Welsh Criminal Justice partners to take the actions to deliver on the plan. Again, when writing this plan, we have ensured our objectives take account of the work already underway on an all-Wales basis. The activities we undertake to meet national requirements also contribute to our local planning.

7. How We Developed Our Objectives

.....

Since the introduction of the Equality Act 2010 the Chief Constable and the Police and Crime Commissioner have set joint strategic objectives within an Equality Plan. These objectives have driven the work around equality over the years that have enabled both organisations to meet the requirements of the Public Sector Equality Duty.

In preparing this plan we have reflected upon previous plans to ensure that we continue to learn and maintain our momentum. In developing these objectives, we have considered the following areas:

Engagement and Consultation with Communities and Staff

Our engagement must be open, inclusive and accessible to everyone who has an interest in this work, and we acknowledge that it should be a continual process. We will continue to involve people through the life of our Equality Plan, drawing on the experience of a wide range of stakeholders to inform our actions, judge whether we have succeeded and consider what more needs to be done.

We have maintained engagement with communities using existing, long established stakeholder engagement forums. The Force and Commissioner have engaged and consulted to understand people's policing priorities and the equality challenges that consequently arise.

Our engagement and consultation process are firmly embedded in order that we are permanently able to hear and respond to what our diverse communities have to say about policing services in North Wales. Additionally, we have undertaken further engagement with our internal staff networks and our public sector partners.

Analysis of Information from Engagement and Consultation

In conjunction with stakeholders, we reviewed the objectives established under the previous Equality Plan to find out what we should be prioritising for the coming years. We asked our stakeholders what was most important when it came to promoting issues of equality and fairness within the policing service. A Consultation and Engagement Report can be found [here](#), this outlines the feedback from our most recent public Equality Plan Survey.

Local and National Research

As outlined above there are various plans, reports and documents that will help to inform our delivery plans and activity. In response to current policing issues and trends there are also national action plans, guidance documents and toolkits that will help to inform our delivery plans and activity.

Working in Partnership

We recognise that policing does not take place in a vacuum. Understanding the partnership landscape in North Wales is important to us and we will continue to work alongside our partners² to enable a more effective public service provision across our communities.

We also work with the North Wales Public Sector Equality Network (the Network) This Network is made up of several key local partners including the six local authorities of North Wales, Betsi Cadwaladr University Health Board, North Wales Fire and Rescue Service, the Welsh Ambulance Service, Snowdonia National Park Authority as well as the Force and OPCC. Partnership working through the Network is a best practice approach to equality through collaboration and has previously received acclaim from Welsh ministers.

Force Level Data

Information held on North Wales Police Force data systems has also informed our equality objectives. This information is useful in answering questions such as 'Are the national trends reflected in North Wales?' and allows us to identify more specific local issues which may not be identified nationally.

Looking Ahead

As with previous plans we recognise the importance of looking to the future, for developments in legislation, emerging issues and opportunities to embrace further change. We've seen over many years how unknown future events can escalate quickly to provide concerns or opportunities for different communities. These events can develop rapidly and usually have clear and important links back to our equality objectives. It is important that we remain open to these developments and be prepared for change when necessary. We will maintain a forward-thinking mindset to recognise what any future potential equality impacts may be.

² <https://www.northwales.police.uk/police-forces/north-wales-police/areas/about-us/about-us/our-partners/>

8. Our Objectives

.....

Considering all the above and taking into account our duties as both a service provider and as an employer, we have decided upon five equality objectives under the following headings:

Effective Governance – In meeting our equality duties, we will exercise effective governance, be transparent and ensure public oversight.

Our Public – Encourage participation and ensure people are neither overpoliced nor under protected.

Our Partners - Work with partners to improve our equality performance.

Our Organisation - Embed a supportive environment that creates an inclusive culture.

Our Workforce - Achieve a representative and professional workforce made up of people with the right skills.

9. How We Will Deliver

.....

To ensure that our commitments are measured and tested, we will create and maintain individual Delivery Plans for each of the above objectives. These Delivery Plans identify the activities we will undertake to support and improve our work. Our goal is to ensure that we are delivering a fair and equitable service for the communities of North Wales.

We will maintain our current approach of service level Equality, Diversity and Inclusion meetings, each with their own bespoke agendas and plans. These meetings will report into a Force level Tactical Board, this will ensure that effective management of activity is taking place. Finally, all of that work will be reported to a Strategic Board, this Board will have oversight and ownership of the Strategic Equality Plan and will ensure it remains fit for purpose.

We will continue to consult and engage with our communities and staff to ensure our Equality Objectives and Delivery Plans are always relevant, ensuring that the views of all our key stakeholders continue to inform our activities.

We will conduct a review of our Equality Objectives each year as part of our annual reporting process and ensure that our activities provide positive outcomes for all those affected by them.

Joint Strategic Equality Plan 2023-2027



HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

