



Response Date: 22/06/2026

### **2026/622 - Reasonable adjustment requests**

In response to your recent request for information regarding;

#### **Request 1 – Training materials on the Equality Act and reasonable adjustments**

Please provide copies of all training materials, presentations, e-learning modules, handouts, and any other resources used to train Safety Camera Unit staff on:

- The Equality Act 2010, in particular sections 20 (reasonable adjustments), 29 (public functions), and 149 (Public Sector Equality Duty);
  - The anticipatory nature of the duty to make reasonable adjustments;
  - Providing evidence and correspondence in accessible formats for disabled people (including those with mobility impairments and dyslexia);
  - Recording and documenting disability-related requests and adjustments provided.
- If training is delivered by external providers, please provide the names of those providers and any course outlines or syllabi.

Staff within the Safety Camera Partnership Unit (SCPU) complete all mandated North Wales Police (NWP) training packages.

The current College of Policing Learn packages for all employees to be completed during the induction phase when starting with NWP include Equality Act 2010.

The training is online therefore a copy is not held.

#### **Request 2 – Accessibility audits of the phone payment line and online portal**

Please provide copies of any accessibility audit, user testing report, usability study, or Equality Impact Assessment conducted on:

- The telephone payment line 0300 1231481 (including assessment of its keypad-only operation and any alternatives for people who cannot press buttons, such as voice-only users);
- The online payment portal at [penaltynotice.direct.gov.uk](https://penaltynotice.direct.gov.uk) (including compatibility with screen readers, voice control software, and other assistive technologies).

If no such audits have been carried out, please confirm this.

The phonenumber and payment portal are not owned by NWP. Please refer to <https://penaltynotice.homeoffice.gov.uk/>

#### **Request 3 – Statistics on reasonable adjustment requests and complaints**

For the calendar years 2023, 2024, and 2025 (and January–June 2026 if available), please provide:

Pencadlys yr Heddlu,  
Glan-y-Don, Bae Colwyn LL29 8AW  
[www.heddlugogleddcymru.police.uk](http://www.heddlugogleddcymru.police.uk)

Police Headquarters,  
Glan-y-Don, Colwyn Bay LL29 8AW  
[www.northwales.police.uk](http://www.northwales.police.uk)

- **The number of reasonable adjustment requests made to the Safety Camera Unit by members of the public (broken down by type of adjustment requested, e.g., accessible format, alternative communication, etc.);**
- **For each request, whether it was granted or refused, and the reason for any refusal;**

We don't record this information.

- **The number of complaints received by the Safety Camera Unit or Professional Standards about failure to make reasonable adjustments, and the outcome of each complaint (e.g., upheld, partially upheld, not upheld).**

Professional Standards Department (PSD)

2023 – 0 complaints

2024 – 0 complaints

2025 – 3 complaints. 2 outcomes determined service acceptable. 1 outcome determined unable to determine if service was acceptable.

2026 – 1 complaint. Still live

**Request 4 – Internal guidance on the Public Sector Equality Duty (section 149)**  
**Please provide copies of any internal guidance, standard operating procedures, memos, or emails sent to Safety Camera Unit staff regarding the application of the Public Sector Equality Duty (section 149 of the Equality Act 2010) when issuing fixed penalty notices, making enforcement decisions, or offering conditional offers.**

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

#### **Request 5 – Equality Impact Assessments for the NIP/FPN process**

**Please provide copies of any Disability Equality Impact Assessment (DEIA), equality analysis, or similar assessment conducted by North Wales Police (or the Safety Camera Unit) in relation to:**

- **The processing of Notices of Intended Prosecution (NIPs) and Fixed Penalty Notices (FPNs);**
- **The accessibility of NIP/FPN forms, evidence disclosure procedures, and payment options (including phone and online);**
- **The provision of reasonable adjustments for disabled people throughout the entire process.**

**If no such assessments have been carried out, please confirm this in writing.**

These processes are governed largely by national frameworks and documentation.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST  
 UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 19/06/2026



# Joint Strategic Equality Plan 2023-2027

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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

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# 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 'A Blakeman'.

**Amanda Blakeman,**  
Chief Constable  
North Wales Police

# 1. Introduction

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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 686,906<sup>1</sup> 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.



<sup>1</sup> Census Maps - Census 2021 data interactive, ONS

### 3. Our Aim

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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

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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

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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

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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 partners<sup>2</sup> 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.

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

## 8. Our Objectives

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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

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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



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