

Equality impact assessment:

Staffordshire Custody

How to complete an equality impact assessment

The equality impact assessment (EIA) will help you to evidence your public sector equality duty (PSED) compliance. It is a live document that outlines the way equality has been considered throughout the life of the policy, process or other project (hereafter referred to as 'product').

If you need help, see the accompanying guidance or contact your diversity, equality and inclusion team.

Version control

Version number	Date	Author	Comments
1	18/9/25	[REDACTED]	

Overview

Name of product under development or review	Staffordshire Custody
Description of the product	Staffordshire Custody Equality Impact Assessment
EIA start date	18/09/2025
EIA author and role	[REDACTED] Criminal Justice- Custody
EIA owner and role	[REDACTED] Criminal Justice- Custody
Date of last review	18/09/2025
Date of next review	18/09/2026

Key product development dates

To evidence PSED compliance, equality and inclusion must be considered throughout the life cycle of a product. You can do this by integrating EIA reviews into key product development stages. List your product's key stages and the dates you will review your EIA here.

Key stage	Date

Research and evidence

To undertake effective equality assessment that meets PSED compliance standards, you must work from an evidence base. Use this section to list the research you will use to understand the product's potential or actual equality impacts (for example, surveys, customer feedback, protected characteristic data, academic research).

1. Protected characteristics data for the team has allowed us to identify the gender disparities. Staff have also been invited to share their protected characteristics for consideration in the preferencing exercise.

Consultation record

Stakeholder consultation will give you a better understanding of your product's impacts and is crucial to satisfying the PSED requirements. Use this section to record the engagement you have undertaken, summarise the feedback received and note subsequent actions. This section can also be used to record nil returns.

Name of group or organisation	Date of contact	Date reply received	Feedback	Action taken or reason why no action was taken
██████████ Equality, Diversity and Inclusion	19/09/2025	28/09/2025	Supported	Asked to share with networks

██████████ – Working for Families	07/10/2025	07/10/2025	Supported	No action needed
██████████ MCA	07/10/2025	09/10/2025	Supported	No action needed
██████████ SAWP	07/10/2025	15/10/2025	Supported	No Action needed
██████████ LGBT+ support network	07/10/2025	20/10/2025	Supported	Updated some of the terminology as suggested
██████████ – Police Federation	07/10/2025	19/10/2025	Supported	Updated to included Staff perspective.
██████████ Unison	07/10/2025	10/07/2025	Supported	No Action needed

General considerations

Use this section to note any general diversity, equality and inclusion activities or considerations that are relevant to the product. Please only document general considerations here. Protected characteristic analysis can be completed in the section below.

The new unit will require a level of operational fitness in order to carry out the role, there is scope for a limited number of posts which could be deemed suitable for colleagues with restrictions. The proposed shift pattern has limited as this is designed purposely to meet demand and availability of victims of crime. The shift patterns will remain under review until such time as appropriate staffing can be achieved on that team to enable the unit to function at go live. This will be monitored for impact by local supervision and the HRO with additional flexibility and support where appropriate.

Impact assessment and actions

Apply learning from research, consultation and project knowledge to consider equality considerations relevant to your project. This should include any potential or actual impacts

(positive or negative), as well as how the project will uphold the three PSED aims for each of the **protected characteristics**.

1. Eliminate discrimination, harassment and victimization.
2. Advance equal opportunity.
3. Foster good relations between people of different characteristics.

If you have identified a negative impact, note what mitigating action will be taken to reduce or eliminate that impact. If no mitigating action can be taken, please explain why. The issues or impacts identified may change, or new factors may emerge, as your project develops. Use the EIA to document these and how your project has evolved to accommodate equality considerations.

Don't forget to consider intersectionality. This refers to when characteristics overlap to shape experiences of inequality and discrimination. For further information, please refer to the 'Addressing Intersectionality within Policing' report.

Duplicate the boxes below if required. If you need further information about a protected characteristic, open the webpage linked to each subtitle.

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All characteristics

Details of positive and/or adverse impact or other issue
<p>Provide safe, secure and lawful custody of detainees, ensuring their treatment is in line with legal and human rights obligations. Establish procedures for booking in, treatment during detention, rights, health care, special protections (e.g. for vulnerable detainees), release or charge etc.</p> <p>When applied and monitored properly, the policy can advance equality of opportunity by ensuring detainees with protected characteristics are treated with dignity, have access to their rights and services.</p> <p>It can foster good relations by demonstrating fairness, transparency, accountability in custody and improving trust especially among minority communities.</p> <p>Could reduce complaints / litigation, improving force reputation and consistency.</p>
Mitigating action for any adverse impact or rationale for no further action
<ul style="list-style-type: none">• Develop / enhance training for all custody staff on equality & diversity, vulnerabilities, gender identity, mental health etc.• Ensure effective vulnerability assessments at booking in and repeatedly during detention.• Improve access to interpreters / translation services for detainees with limited English.• Review facilities to ensure privacy, decency and proper accommodation (female detainees, gender identity, pregnant detainees, older detainees).• Establish monitoring / data collection by protected characteristic for outcomes, complaints and incidents in custody. Use this data to identify disparities and change practice.• Update policies and procedures to explicitly include requirements for religious observance, pregnancy, maternity, gender identity.• Involvement of stakeholder groups (e.g. advocacy groups, communities) for feedback on detainee experience.• Standalone transgender policy

Age

Details of positive and/or adverse impact or other issue
<p>Age is a key factor in custody as both the youngest and oldest detainees are particularly vulnerable. National and Staffordshire data indicates that children are a small but significant</p>

proportion of those detained (~5.3% in Staffordshire, 2023–24), while older detainees often present with complex health and care needs. Young adults (18–25) also face increased risks linked to maturity and vulnerability.

Children & Young People (Under 18)

- PACE requires an Appropriate Adult, protecting rights. Youth Offending Team (YOT) involvement supports diversion and rehabilitation. Policy recognition of juveniles as especially vulnerable ensures higher oversight.
- Over-representation of Black & Mixed-race children in custody (nationally), May not understand rights or custody procedures.
- Greater psychological impact from detention; risk of trauma and mistrust.
- Delays in securing Appropriate Adults.
- Custody environment may not be child-friendly.

Young Adults (18–25)

- Recognition of emerging maturity allows for some safeguarding crossover with juveniles, Opportunities for diversion and early intervention.
- Adapt custody practice to recognise vulnerabilities of young adults. Enhanced welfare checks and monitoring.
- Training for staff on risks specific to young adults (e.g. impulsivity, neurodiversity).

Older People (65+)

- Health screening can identify age-related needs quickly. with recognition of mobility or care needs can trigger medical support
- Enhanced medical and vulnerability screening on booking.
- Fast-track access to healthcare and medication continuity.
- Staff training on dementia, sensory impairments, and frailty.
- Review facilities for age-related accessibility.

Mitigating action for any adverse impact or rationale for no further action

Children & Young People (Under 18)

- Guarantee rapid access to an Appropriate Adult & solicitor.
- Provide age-appropriate rights materials.
- Ensure child-friendly facilities and separation from adults.
- Monitor custody outcomes by age and ethnicity to identify disparities.

Young Adults (18–25)

- More vulnerable than older adults due to developmental maturity.
- Higher risk of self-harm, impulsivity, and poor coping skills.
- May be treated as fully adult despite additional support needs.

Older People (65+)

- Greater risk of undiagnosed or unmanaged health conditions.
- Cognitive impairments (e.g. dementia) may affect understanding of rights.
- Risk of delayed access to necessary medication or care.
- Physical environment (cells, beds, toilets) may be unsuitable.

Motivation for Mitigation

Legal Duties:

- Equality Act 2010 (Public Sector Equality Duty) and PACE safeguards require age-appropriate treatment.
- Human Rights: UN Convention on the Rights of the Child stresses detention as a last resort; ECHR Article 3 demands dignity and protection from degrading treatment.
- Operational Benefits: Strong safeguards reduce complaints, legal challenges, deaths in custody, and improve detainee safety
- Public Confidence: Fair and proportionate treatment of children, young adults, and older detainees strengthens legitimacy and trust in Staffordshire Police, particularly among minority communities where disproportionality exists.

Disability or neurodiversity

Details of positive and/or adverse impact or other issue

Detainees with disabilities and neurodivergent conditions (e.g. autism, ADHD, dyslexia, learning disabilities) are over-represented in custody nationally and often face additional barriers to understanding their rights or coping in detention. Mental health conditions, sensory impairments, and physical disabilities also require proactive support. National inspection reports consistently identify disability and neurodiversity as high-risk areas for unfair or unsafe treatment in custody.

Positive Impacts

When mitigations are applied properly, custody staff can:

- Uphold rights through tailored communication.
- Provide safer environments for vulnerable detainees.
- Reduce escalation and need for force by recognising behavioural differences.
- Build community trust by demonstrating fairness, dignity, and compliance with equality duties.

Physical Disabilities (mobility, long-term illness, chronic conditions)

Policy requires health screening on arrival, which can identify needs and the ability to make “reasonable adjustments” under Equality Act 2010.

- Custody suites may not be fully accessible (cells, toilets, beds).
- Missed or delayed medication.
- Increased risk of falls, injury, or neglect

Sensory Impairments (deafness, blindness, speech difficulties)

- Use of interpreters or communication aids when available.
- Communication barriers: detainees may not understand rights, questions, or custody procedures.
- Reliance on written materials excludes visually impaired detainees.

Neurodivergence (autism, ADHD, dyslexia, learning disability)

- Policy allows for vulnerability assessments, which can flag risks.
- Opportunity to divert to support services or apply appropriate safeguards.
- High risk of miscommunication or misunderstanding of rights.
- May struggle with bright lights, loud noises, or confinement (sensory overload).
- Heightened risk of self-harm or distress.

- Possible misinterpretation of behaviour as non-compliance.

Mental Health Conditions

- Policy already requires health checks and liaison with NHS Liaison & Diversion services.
- Over-representation: people with mental health issues are significantly more likely to be detained.
- Risk of inadequate healthcare, self-harm, suicide, or neglect.
- Delays in securing mental health support

Mitigating action for any adverse impact or rationale for no further action

Physical Disabilities (mobility, long-term illness, chronic conditions)

- Accessibility audit of custody suites.
- Rapid continuity of prescribed medication.
- Clear procedures for accommodating mobility needs.

Sensory Impairments (deafness, blindness, speech difficulties)

- Provide alternative formats (Braille, large print, audio).
- Ensure British Sign Language (BSL) interpreters are available
- Staff training in basic communication methods.

Neurodivergence (autism, ADHD, dyslexia, learning disability)

- Introduce autism/neurodiversity screening questions at booking.
- Provide adjusted environments (quiet cells, dimmed lighting where possible).
- Staff training in autism awareness, ADHD, and learning disabilities.
- Simplify communication; use visual aids.

Mental Health Conditions

- Enhanced vulnerability screening for mental health.
- Dedicated healthcare professionals in custody.
- Suicide/self-harm prevention protocols.
- Strengthen referral to mental health services.

Motivation for Mitigation

- Legal Duty: Equality Act 2010 (reasonable adjustments duty), Human Rights Act, and PACE require protection for vulnerable detainees.
- Operational Risk: Disability and neurodiversity vulnerabilities increase risk of in-custody deaths, litigation, or reputational damage.
- Fairness & Trust: Ensuring fair treatment reduces complaints, builds confidence with disabled communities, and fosters trust in policing.

- Public Scrutiny: HMICFRS and Independent Custody Visitors consistently highlight gaps in provision for neurodivergent and disabled detainees.

Gender reassignment

Details of positive and/or adverse impact or other issue

Transgender and non-binary detainees are a particularly vulnerable group in custody. Nationally, reports from HMICFRS and advocacy groups highlight concerns about privacy, dignity, cell allocation, and searches. The Equality Act 2010 provides explicit protection for those proposing to undergo, undergoing, or who have undergone gender reassignment. (We must also recognise that there are a large number of trans people who will chose not to have any kind of surgery.)

A failure to respect identity or provide appropriate facilities can lead to discrimination, safety risks, and reputational damage for policing.

Custody can be a challenging environment for colleagues who identify as transgender or non-binary, especially where their identity is not widely known or disclosed.

Staffordshire Police is committed to maintaining confidentiality, dignity and respect for all staff. Managers will ensure that any adjustments or support needs are discussed privately and sensitively, in line with HR and confidentiality policies. All staff are expected to uphold inclusive standards of behaviour and language, fostering a safe and supportive workplace for trans colleagues.

Positive Impacts

- Clear, respectful processes can protect dignity, wellbeing, and safety of transgender detainees.
- When properly applied, policy can reduce vulnerability to bullying, self-harm, and discrimination.
- Supports Staffordshire Police's equality objectives and builds trust with minority communities.

Recognition of Identity

- Policy can allow detainees to self-identify their gender and ensure this is respected in records.
- Risk of mis gendering or non-recognition, causing distress, humiliation, or distrust.
- Disclosure of trans status may breach confidentiality

Searches

- Policy can provide clear guidance on searches in line with detainee's identified gender.
- Risk of inappropriate or intrusive searches; detainee may feel violated if searched by officer of opposite gender identity.
- Inconsistencies between staff approaches

Vulnerability & Wellbeing

- Staff awareness can reduce bullying and ensure protection of trans detainees.
- Trans detainees at higher risk of bullying, harassment, self-harm, and mental health crisis in custody.

Mitigating action for any adverse impact or rationale for no further action

Recognition of Identity

- Explicit policy commitment to self-identification.
- Confidential handling of gender identity data.
- Staff training on respectful communication and pronoun use.

Accommodation (cell allocation, facilities)

- Where recognised, detainees may be placed in accommodation consistent with their gender identity.
- Risk of inappropriate placement (e.g. housing a trans woman in male custody), creating safety risks including assault, bullying, or harassment.
- Facilities (toilets, showers) may not respect privacy or identity

Accommodation (cell allocation, facilities)

- Case-by-case risk assessment with detainee involvement.
- Separate accommodation where necessary for safety, without punitive segregation.
- Facilities audit to ensure privacy and dignity.

Searches

- Allow detainee to express preference (search by male or female officer).
- Provide training and clear operational guidance.
- Ensure dignity in strip searches, with oversight.

Vulnerability & Wellbeing

- Enhanced monitoring and safeguarding.
- Zero-tolerance approach to harassment in custody.

- Access to healthcare, including continuation of prescribed hormone treatment where applicable.

Motivation for Mitigation

- **Legal Duty:** Gender reassignment is a protected characteristic under the Equality Act 2010 — failure to provide safeguards risks unlawful discrimination.
- **Human Rights:** Article 3 (freedom from degrading treatment) and Article 8 (privacy and family life) of the European Convention on Human Rights apply directly.
- **Operational Risk:** Failures can lead to complaints, civil claims, or judicial reviews, damaging trust in Staffordshire Police.
- **Public Confidence:** Fair and respectful treatment of transgender detainees improves legitimacy and helps reassure wider LGBTQ+ communities of police fairness.

Marriage and civil partnership

Details of positive and/or adverse impact or other issue

Marriage and civil partnership are protected under the Equality Act 2010, though only in relation to preventing unlawful discrimination. In custody, this characteristic is less frequently highlighted than others, but it remains relevant when detainees request recognition of their legal relationship, need to notify partners, or where treatment of married vs unmarried detainees could differ.

Positive Impacts

- When handled appropriately, recognising marriage and civil partnerships demonstrates fairness and respect.
- Supports detainee wellbeing by ensuring significant relationships are valued.
- Reinforces Staffordshire Police’s commitment to equality and diversity

Recognition of Relationships

- Policy can ensure all detainees, regardless of marital or partnership status, have equal rights to notify someone of their detention.
- Respect for civil partnership status promotes inclusivity.
- Risk of staff failing to recognise civil partnerships as legally equivalent to marriage.
- Possible heteronormative assumptions, overlooking same-sex partners.

Notification of Detention

- Detainees may nominate a spouse or civil partner as their “named person” under PACE.
- Risk that custody staff might not accept a civil partner as equivalent to a spouse.
- Unmarried partners may be treated less favourably if policy is not applied consistently

Vulnerability & Welfare

- Stress and distress if detainee feel their civil partnership is dismissed or not respected.
- Potential for indirect discrimination if same-sex couples face delays or obstacles in recognition.

Mitigating action for any adverse impact or rationale for no further action

Recognition of Relationships

- Explicitly reference “marriage and civil partnership” in custody guidance.
- Staff training on equality of recognition.
- Monitoring of detainee complaints about relationship recognition.

Notification of Detention

- Clear policy that partners (married or civil) are treated equally when nominated.
- Include in staff training and custody induction materials.

Vulnerability & Welfare

- Staff training to reinforce inclusivity.
- Ensure detainee rights information explicitly states recognition of marriage and civil partnerships.

Motivation for Mitigation

- Legal Compliance: Equality Act 2010 prohibits discrimination on the basis of marriage or civil partnership.
- Human Rights: Article 8 (right to respect for family and private life) supports detainees’ rights to recognition of legal relationships.
- Operational Fairness: Equal recognition prevents grievances and demonstrates professionalism.
- Public Confidence: Respecting civil partnerships fosters trust with LGBTQ+ communities and ensures Staffordshire Police demonstrates inclusivity in line with equality duties.

Recognition of Relationships

Pregnancy and maternity

Details of positive and/or adverse impact or other issue

Pregnant and postnatal detainees are particularly vulnerable in custody due to health, safety, and welfare needs. The Equality Act 2010 provides explicit protection against discrimination related to pregnancy and maternity. Risks include delayed access to healthcare, lack of suitable facilities,

and failure to identify pregnancy at booking. Good practice requires sensitive handling, rapid medical referrals, and dignity in treatment.

Positive Impacts

- Properly applied policies ensure the safety and dignity of both detainee and unborn child.
- Early identification of pregnancy allows rapid support and access to healthcare.
- Demonstrates Staffordshire Police's commitment to safeguarding vulnerable detainees.
- Reduces risk of litigation, complaints, or negative media attention related to pregnancy in custody.

Identification of Pregnancy

- Medical screening on booking in provides an opportunity to identify pregnancy early.
- Risk of pregnancy not being disclosed or identified, especially in early stages.
- Potential for detainee embarrassment or fear to disclose.

Healthcare Needs

- Policy can ensure rapid referral to healthcare staff for antenatal care.
- Risk of missed or delayed medical attention for complications.
- Risk of miscarriage or harm to unborn child if health not properly monitored.

Facilities & Conditions

- Where appropriate facilities exist, detainees can be accommodated with dignity.
- Custody suites often lack suitable beds, toilets, or sanitary products.
- Conditions may be unsafe or degrading (e.g. hard cell beds, lack of privacy)

Maternity / Postnatal Needs

- Policy can provide access to breastfeeding support and postnatal care if required.
- Lack of access to breastfeeding facilities or medical checks for new mothers.
- Risk of inadequate nutrition or hydration impacting maternal health.

Vulnerability & Safeguarding

- Recognising pregnancy increases safeguarding, ensuring closer monitoring.
- Pregnant women are at higher risk of stress, anxiety, or harm in custody.
- Lack of staff awareness may lead to inappropriate treatment (e.g. during searches)

Mitigating action for any adverse impact or rationale for no further action

Identification of Pregnancy

- Ensure direct, sensitive questioning on pregnancy at booking in.
- Train staff in safeguarding pregnant detainees.

- Provide private space for disclosure.

Healthcare Needs

- Fast-track access to healthcare professionals.
- Clear referral pathways for maternity services.
- Mandatory recording and continuity of prescribed medication.

Facilities & Conditions

- Audit custody facilities for pregnancy suitability.
- Provide sanitary products, maternity pads, extra bedding, and suitable nutrition.
- Ensure toilets and washing facilities meet dignity needs.

Maternity / Postnatal Needs

- Clear guidance on maternity and postnatal support.
- Link with healthcare services to provide continuity of care

Vulnerability & Safeguarding

- Enhanced monitoring and welfare checks.
- Searches to be conducted with dignity and sensitivity.
- Zero-tolerance for degrading treatment.

Motivation for Mitigation

- Legal Duty: Equality Act 2010 protects pregnancy and maternity; failure to provide safeguards is unlawful.
- Human Rights: Article 3 (freedom from degrading treatment) and Article 8 (privacy and family life) of the ECHR are particularly relevant.
- Health & Safety: Pregnancy introduces medical risks (miscarriage, complications) that require proactive safeguarding.
- Public Trust: Demonstrating fairness and dignity towards pregnant detainees strengthens legitimacy and reduces reputational risk.

Ethnicity

Details of positive and/or adverse impact or other issue

Race and ethnicity remain central to equality considerations in custody. National custody data shows people from Black and Mixed ethnic backgrounds are disproportionately represented, particularly among children. Language barriers, cultural misunderstandings, and unconscious bias can create risks of unequal treatment. The Equality Act 2010 prohibits direct and indirect racial

discrimination, and the Public Sector Equality Duty requires Staffordshire Police to actively work to reduce disproportionality and improve trust with minority communities.

Positive Impacts

- Fair, culturally aware custody practice strengthens detainee trust and compliance.
- Access to interpreters and translated materials ensures detainees fully understand their rights.
- Monitoring and transparency of ethnicity data demonstrate Staffordshire Police's commitment to fairness.
- Proactive engagement with minority communities helps rebuild confidence and legitimacy.

Representation in Custody

- Policy ensures all detainees are treated equally regardless of ethnicity.
- Monitoring of data by ethnicity provides transparency.
- Over-representation of Black and Mixed ethnic detainees, especially juveniles (national custody data).
- Risk of indirect discrimination through disproportional use of stop/search and arrests feeding into custody

Language & Communication

- Interpreter services are available to assist detainees with limited English proficiency.
- Risk of detainees not understanding their rights or custody procedures if interpreter not provided promptly.
- Reliance on written English excludes some detainees.

Cultural & Religious Needs

- Policy can accommodate religious dietary requirements, prayer needs, and cultural sensitivities.
- Risk of religious or cultural needs being overlooked (e.g. diet, prayer times, handling of personal items).
- Risk of detainees feeling disrespected or humiliated if staff lack cultural awareness.

Unconscious Bias & Fairness

- Monitoring and staff training can reduce risk of discriminatory treatment.
- Risk of unconscious bias affecting decisions (e.g. strip searches, use of force, risk assessment outcomes).
- Nationally, people from minority ethnic backgrounds report lower trust in custody processes.

Mitigating action for any adverse impact or rationale for no further action

Representation in Custody

- Collect and analyse local custody data by ethnicity.
- Share data with oversight bodies (ICVs, community panels).
- Targeted community engagement to address concerns

Language & Communication

- Guarantee access to professional interpreters, not family/friends.
- Provide rights and welfare materials in multiple languages.

Cultural & Religious Needs

- Train staff in cultural and religious awareness.
- Provide appropriate meals and prayer facilities.
- Allow respectful handling of religious items (e.g. head coverings, prayer beads).

Unconscious Bias & Fairness

- Regular bias awareness training for custody staff.
- Oversight of high-impact decisions (strip searches, force) broken down by ethnicity.
- Independent scrutiny through ICVs and community groups.

Motivation for Mitigation

- Legal Compliance: Equality Act 2010 and Human Rights Act prohibit racial discrimination and require proactive equality promotion.
- Operational Effectiveness: Reducing disproportionality improves efficiency, fairness, and reduces risk of grievances or legal challenges.
- Public Trust: Addressing ethnic disproportionality directly is essential to maintaining legitimacy with Staffordshire's diverse communities.
- Inspection Findings: HMICFRS inspections nationally highlight ethnicity as a recurring concern in custody settings, particularly around strip searches, use of force, and decision-making.

Religion or belief

Details of positive and/or adverse impact or other issue

Religion and belief (including non-belief) are protected under the Equality Act 2010. In custody, this applies to how detainees are treated in relation to their religious practices, dietary requirements, clothing, and items of faith. A lack of awareness or accommodation can lead to

discrimination, distress, or loss of trust. Proactive respect and reasonable adjustments support fairness and dignity.

Positive Impacts

- Respecting religious needs demonstrates fairness and inclusivity.
- Providing appropriate meals and prayer facilities promotes detainee dignity and wellbeing.
- Enhances community confidence, particularly among faith-based groups who may have concerns about policing.
- Reduces risk of complaints, litigation, or reputational harm to Staffordshire Police.

Dietary Needs

- Custody suites can provide halal, kosher, vegetarian, or vegan meals as appropriate.
- Risk of detainees being given food inconsistent with their faith.
- Failure to provide suitable meals may breach Equality Act or Human Rights Act

Prayer & Religious Observance

- Custody policy can allow for prayer times and access to faith items (e.g. prayer beads, prayer mats).
- Risk of detainees being denied opportunity to pray or observe faith requirements due to staff oversight or lack of facilities

Clothing & Religious Articles

- Respecting faith clothing and symbols can preserve dignity and trust.
- Requirement to remove items (e.g. headscarves, turbans, crucifixes) for searches may cause distress if not handled sensitively.
- Risk of humiliating treatment if items removed unnecessarily

Non-belief / Humanism

- Policy applies equally to those with no religion.
- Risk that non-believers feel overlooked if faith practices are prioritised disproportionately

Mitigating action for any adverse impact or rationale for no further action

Dietary Needs

- Maintain stock of faith-appropriate meals.
- Record dietary needs at booking.
- Train staff on religious dietary rules.

Prayer & Religious Observance

- Provide access to prayer materials, religious books, prayer mats etc.
- Where safe, allow detainees space and privacy for prayer.
- Cells display discreet indication of the direction of Mecca for prayer.
- Train staff on common prayer observances (e.g. Friday prayers, Ramadan fasting).
- Recognise need for some detainees to wash before prayers and ensure this is facilitated in a timely and respectful manner

Clothing & Religious Articles

- Staff training on handling faith items with respect.
- Provide private areas for removal where necessary.
- Ensure items are stored securely and returned promptly.

Non-belief / Humanism

- Ensure policies explicitly include protection for belief and non-belief.

Motivation for Mitigation

- Legal Duty: Equality Act 2010 prohibits discrimination based on religion or belief, including non-belief.
- Human Rights: Article 9 of the European Convention on Human Rights guarantees freedom of thought, conscience, and religion.
- Operational Fairness: Accommodating faith needs improves compliance, reduces tension, and lowers risk of grievances.
- Public Confidence: Demonstrating respect for diverse religions and beliefs builds trust with Staffordshire's communities, especially in custody which is often seen as high-risk for discriminatory treatment.

Sex

Details of positive and/or adverse impact or other issue

Gender and Sex is a protected characteristic under the Equality Act 2010. In custody, the key issues relate to fair treatment of male and female detainees, dignity during searches, cell allocation, safeguarding against gender-based harm, and addressing the needs of female detainees who are statistically more likely to present as vulnerable (e.g. higher prevalence of mental health issues, self-harm, and histories of abuse).

Positive Impacts

- Gender-sensitive custody practice enhances fairness, dignity, and safety.
- Female detainees receive appropriate support for vulnerabilities, reducing risk of harm.

- Strengthens Staffordshire Police’s compliance with equality duties and inspection standards.
- Improves community confidence in the fair treatment of men and women in custody.

Searches

- Policy requires same-sex searches, protecting detainee dignity.
- Risk of cross-gender searching without consent, leading to distress or complaints.
- Inconsistent application of policy by staff.

Accommodation

- Male and female detainees are separated for safeguarding. Non-Binary detainees will be accommodated in the most appropriate location to ensure robust safeguarding
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- Risk of inadequate facilities for women if suite is designed predominantly for male detainees.
- Lack of privacy or dignity in toilet/shower facilities.

Healthcare & Welfare

- Policy provides equal access to medical assessment and treatment.
- Women in custody more likely to present with complex vulnerabilities (mental health, substance misuse, history of abuse).
- Risk of inadequate support if female-specific needs are not recognised

Use of Force & Safeguarding

- Gender considerations can reduce risk of inappropriate or excessive force.
- Women detainees are disproportionately at risk of self-harm in custody.
- Potential for re-traumatisation of female detainees with abuse histories during restraint or searches.

Mitigating action for any adverse impact or rationale for no further action

Searches

- Clear operational guidance on search procedures.
- Ensure searches are same-sex unless detainee consents otherwise.
- Training for staff on gender-sensitive searching

Accommodation

- Ensure separate, safe accommodation for female and non-binary detainees.
- Carry out facility audits for privacy and suitability

Healthcare & Welfare

- Enhanced screening for female detainees (mental health, safeguarding, domestic abuse history).
- Access to sanitary products as standard.
- Welfare checks tailored to vulnerabilities.

Use of Force & Safeguarding

- Trauma-informed practice training for custody staff.
- Close monitoring of female detainees at risk of self-harm.
- Independent oversight of use of force data disaggregated by gender.

Motivation for Mitigation

- Legal Duty: Equality Act 2010 prohibits discrimination based on sex.
- Human Rights: Article 3 (freedom from degrading treatment) and Article 8 (privacy) apply strongly to gender-specific risks.
- Operational Risk: Failure to safeguard appropriately by gender can lead to complaints, legal claims, and reputational harm.
- Inspection Findings: HMICFRS and ICV reports consistently highlight gaps in provision for female detainees, particularly regarding sanitary products, mental health care, and dignity in searches.
- Public Confidence: Demonstrating gender-sensitive practice strengthens legitimacy, particularly with women who may already have lower trust in policing due to prior experiences.

Sexual orientation

Details of positive and/or adverse impact or other issue

Sexual orientation is a protected characteristic under the Equality Act 2010. In custody, detainees who identify as LGBTQ+ may face increased risks of discrimination, harassment, or vulnerability, both from other detainees and, if not properly managed, from staff. Fear of disclosure and lack of awareness can also prevent detainees from accessing support. Custody policies must actively safeguard detainees and promote dignity, fairness, and confidentiality.

Positive Impacts

- Detainees feel safer and more respected when orientation is acknowledged and protected.
- Safeguards reduce risk of bullying, harassment, or self-harm.
- Promotes Staffordshire Police's commitment to equality, fairness, and professionalism.
- Helps strengthen relationships with local LGBTQ+ communities through visible inclusivity

Recognition & Respect

- Policy can explicitly confirm that detainees are treated equally regardless of sexual orientation.
- Risk of discrimination, insensitive language, or inappropriate assumptions by staff.
- Risk of detainee concealing orientation, reducing access to support.

Confidentiality

- Secure handling of detainee information protects dignity.
- Disclosure of sexual orientation without consent could cause distress or risk, particularly in small communities

Safety in Custody

- Policy can ensure risk assessments consider sexual orientation when identifying potential vulnerability.
- Risk of bullying, harassment, or victimisation from other detainees.
- LGBTQ+ detainees may be at higher risk of self-harm.

Healthcare & Support

- Opportunity to link detainees to appropriate support services on release.
- Risk that detainees with specific sexual-health needs are overlooked if staff lack awareness or detainee does not feel safe to disclose.

Mitigating action for any adverse impact or rationale for no further action

Recognition & Respect

- Staff training in LGBTQ+ awareness.
- Promote a culture of respect and dignity.
- Clear complaint and escalation processes for discriminatory behaviour.

Confidentiality

- Explicit policy that sexual orientation is only recorded/disclosed when necessary for safeguarding or detainee choice

Safety in Custody

- Enhanced safeguarding checks.
- Monitor detainees at risk of bullying/harassment.
- Zero-tolerance approach to discriminatory behaviour in custody.

Healthcare & Support

- Ensure healthcare staff are trained in inclusive practice.

- Signpost detainees to LGBTQ+ support services post-custody.

Motivation for Mitigation

- Legal Duty: Equality Act 2010 prohibits discrimination based on sexual orientation.
- Human Rights: Article 8 of the ECHR protects privacy and dignity; Article 14 prohibits discrimination.
- Operational Fairness: Fair treatment reduces complaints, grievances, and potential legal challenges.
- Public Confidence: Respectful, inclusive treatment of LGBTQ+ detainees strengthens community trust in Staffordshire Police.

Socio-economic background

Our socio-economic background is a combination of different factors, such as our income, occupation and social background. A person’s socio-economic background can expose them to inequalities, so it’s important to understand how your project could affect different socio-economic groups. Further information about socio-economic status can be found in the Cabinet Office [Measuring socio-economic background in your workforce](#) guidance.

Details of positive and/or adverse impact or other issue

Individuals from lower socio-economic backgrounds are disproportionately represented in the criminal justice system, including police custody. Deprivation is closely linked to poor physical and mental health, higher rates of substance misuse, lower levels of education, and reduced access to legal and healthcare support. Custody policies should therefore recognise and mitigate risks associated with disadvantage, ensuring fair treatment and equitable access to services.

Positive Impacts

- Providing tailored support helps break cycles of repeat custody for disadvantaged detainees.
- Improved communication ensures detainees understand rights, bail conditions, and next steps.
- Strong diversion links reduce reoffending and build safer communities.
- Demonstrates Staffordshire Police’s commitment to fairness, inclusivity, and reducing disproportionality.

Access to Legal Advice

- Policy ensures all detainees are informed of their right to free legal advice.

- Those from deprived backgrounds may be less aware of their rights or less likely to request legal representation.

Healthcare & Vulnerability

- Custody health assessments can identify needs regardless of background.
- Higher rates of substance misuse, mental health issues, and long-term illness in disadvantaged groups.
- Risk of health needs being under-reported or minimised.

Communication & Literacy

- Rights materials can be explained verbally to support understanding.
- Detainees with poor literacy or education may not fully understand written materials (PACE rights, bail conditions, etc.)

Repeat Detention / Criminalisation

- Policy can divert vulnerable individuals to support services (drug, alcohol, housing).
- Disadvantaged individuals more likely to experience repeat custody due to homelessness, unemployment, or lack of support networks

Dignity & Fairness

- Equal treatment policies benefit all detainees.
- Risk of stigma or unconscious bias from staff towards detainees from disadvantaged backgrounds

Mitigating action for any adverse impact or rationale for no further action

Access to Legal Advice

- Reinforce access to free legal advice as standard.
- Ensure information is provided clearly and repeated if necessary.

Healthcare & Vulnerability

- Enhanced vulnerability screening.
- Close liaison with NHS Liaison & Diversion teams.
- Proactive referral to support services.

Communication & Literacy

- Provide easy-read or simplified formats.
- Ensure staff explain rights verbally and check understanding

Repeat Detention / Criminalisation

- Strengthen diversion pathways (housing, drug/alcohol services, probation links).

- Record and monitor repeat custody rates linked to deprivation.

Dignity & Fairness

- Staff training in unconscious bias and trauma-informed practice.
- Promote professionalism and respect in all interactions.

Motivation for Mitigation

- **Fairness & Equality:** Even though socio-economic status is not a protected characteristic; Staffordshire Police has a duty to treat all detainees fairly and proportionately.
- **Operational Efficiency:** Addressing vulnerabilities linked to deprivation reduces repeat detention and demand on custody services.
- **Public Confidence:** Demonstrating fairness to disadvantaged individuals strengthens trust with communities that may feel marginalised by policing.
- **Safeguarding:** Disadvantage increases vulnerability, making safeguarding interventions essential to reduce risk of harm in custody.

Other characteristics

Use this section to consider the PSED aims and any impacts your product may have on characteristics that are not protected under the Equality Act 2010 but are still significant to equality and inclusion. For example, your product may have a particular effect on people with caring responsibilities or on people with English as an added language, or you may need to consider the Welsh Language (Wales) Measure 2011 in delivery. Think creatively and invite input from stakeholders.

Details of impact or other issue

Beyond the Equality Act's protected characteristics, a range of other social and personal factors can affect vulnerability, fairness, and outcomes in custody. These include being care-experienced, homeless, a veteran, an asylum seeker/refugee, or belonging to traveller communities. While not legally protected under the Equality Act, these characteristics are recognised in national custody guidance (PACE Codes of Practice, NPCC guidance, HMICFRS inspections) as requiring additional sensitivity and support.

Positive Impacts

- Tailored support reduces risk of harm and repeat detention.

- Referrals to external services (housing, veterans' charities, safeguarding teams) strengthen community safety.
- Transparency in recognising additional vulnerabilities shows Staffordshire Police going beyond legal minimums to safeguard detainees.
- Builds trust with communities who may otherwise feel excluded or marginalised by the criminal justice system.

Care-experienced (children/adults)

- Custody staff can recognise vulnerability and make referrals to safeguarding teams.
- Higher risk of self-harm, poor mental health, and distrust of authorities.
- Young people may not understand rights or processes

Homelessness

- Custody provides a point of contact for health and housing referrals.
- Lack of fixed address complicates bail decisions.
- Higher rates of substance misuse and vulnerability.

Veterans

- Liaison with veterans' support organisations can provide tailored help.
- PTSD, mental health issues, or substance misuse may be present

Traveller & Roma communities

- Policy applies equally regardless of background.
- Risk of stereotyping, discrimination, or misunderstanding of cultural practices.
- Distrust of police may heighten tensions.

Asylum seekers / Refugees / Migrants

- Interpreter and translation services available.
- Language barriers may prevent detainees understanding rights.
- Past trauma may heighten stress or mental health risk.

Rural Isolation / Economic Exclusion

- Custody provides link to public services detainees may otherwise miss.
- Reduced access to healthcare, legal advice, or family support networks if detained far from home.

Mitigating action or rationale for no further action

Care-experienced (children/adults)

- Strong links with children's services.

- Ensure an Appropriate Adult is provided promptly.

Homelessness

- Consider alternatives to bail refusal where housing is the barrier.
- Liaise with housing outreach/homeless charities

Veterans

- Screening to identify veteran status.
- Referral to Armed Forces/veteran support pathways.

Traveller & Roma communities

- Staff training in cultural awareness.
- Engagement with traveller liaison officers or community advocates

Asylum seekers / Refugees / Migrants

- Ensure interpreters are available promptly.
- Trauma-informed approach to interviews and detention.

Rural Isolation / Economic Exclusion

- Ensure prompt contact with support networks.
- Consider transport/logistics when arranging release.

Motivation for Mitigation

- Fairness & Safeguarding: Vulnerability does not always fit within the Equality Act categories, but the duty of care in custody extends to all detainees.
- Public Confidence: Recognising and supporting “hidden vulnerabilities” (e.g. homelessness, care-experience) demonstrates Staffordshire Police’s commitment to inclusive practice.
- Operational Risk: Neglecting additional vulnerabilities increases risk of self-harm, complaints, and negative inspection findings.
- Partnership Working: Custody provides a unique opportunity to connect disadvantaged individuals with wider health, housing, and community support services

Action log

Record EIA actions and monitor action progress in the optional action log.