

# **Youth Crime Action Plan**

## **Equality Impact Assessment**

**Home Office**

**Department for Children, Schools and Families**

**Ministry of Justice**

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# 1 Background

- 1.1 The Government is committed to tackling crime, and in particular intervening early with young people to prevent crime and antisocial behaviour and reduce the impact of youth crime on our communities.
- 1.2 The Youth Crime Action Plan, published on 15 July 2008 sets out an overall strategy for youth crime reduction with short term and longer term actions and solutions to problems that are of concern to us all. The Action Plan will deliver results across youth crime prevention and youth justice as well as a cross cutting theme on victimisation. The overall aim is to reduce offending and re-offending by young people.
- 1.3 The Equality Impact Assessment (EIA) is a legal requirement on public bodies as part of the public duties on Race, Gender and Disability. In line with good practice across the Home Office, Ministry of Justice and the Department for Children, Schools and Families, the Youth Crime Action Plan was also developed in consideration of any impact on gender identity, religion, belief and non-belief, sexual orientation, although any disproportionate impact on any of these groups is believed to be minimal. Obviously due to the focus on young people in the YCAP, there is clearly significant consideration of, and impact on certain age groups. It also considers some issues of socio-economic background/social class.
- 1.4 Total crime has fallen by 42% since the mid-1990s, with a substantial fall in violent crime. However youth offending levels have remained relatively stable, with about 25% of young people admitting to offending in the previous year. This is estimated to be about 2.8 million offences. On a per capita basis, the volume of youth offending is higher than adult offending.
- 1.5 Much of this offending is 'youth on youth' with young people being most likely to become victims of other young people (89% of assaults with injury on 10-15s were perpetrated by under 16s). 30% of young people (aged 10-15) reported being a victim of personal crime in the previous year (OCJS) compared to 7% of adults (BCS).
- 1.6 Despite the level of youth offending remaining relatively constant, the public generally overestimate the involvement of young people in crime. In 1997 only 11% of known offenders were under 18, but 28% of those asked believed young people were responsible for more crime than adults, and a further 55% thought they were responsible for the same amount as adults (Youth Crime Briefing, NACRO).

- 1.7 The Youth Crime Action Plan addresses 4 key themes which the Government sees as key to tackling and reducing the harm caused by youth crime: **Enforcement; Prevention; Victims; and Justice.**
- 1.8 There are some recommendations/next steps contained in section 5 of this report which the implementation team will take into consideration when taking forward the actions contained in the YCAP.

## 2 Methodology

- 2.1 This equality impact assessment is based on a brief document review including research and reports from the Home Office, Department of Children, Schools and Families, the Ministry of Justice and the Youth Justice Board, as well as outside organisations. It also incorporates feedback from a number of stakeholder and steering group events held during the development process of the Youth Crime Action Plan (YCAP).
- 2.2 Key policy leads in the main Government Departments involved in the production of the YCAP were also consulted and involved in discussions on the equality impacts of the plan.
- 2.3 Analysis was conducted on the basis of current equality legislation requirements and takes into account seven key diversity strands, in varying degrees; race; gender; gender identity; disability; faith or religion, sexual orientation; and age.

## 3 Consultation and Involvement

- 3.1 We recognise that some of the policies contained within the Youth Crime Action Plan will disproportionately affect some communities or groups of people. This acknowledges that crime and disorder are not committed uniformly by or against a cross section of society, and that they do not impact on, or affect every community or region in the same way.
- 3.2 The ethnicity, gender, age, socio-economic status, and geographical location of an individual may significantly affect the likelihood of their involvement in crime or anti-social behaviour, either as a perpetrator, or a victim.
- 3.3 However recognising that our policies might disproportionately affect some groups over others, rather than being discriminatory or negative, is in fact a positive step towards equality of opportunity, service provision and standard and quality of living. Policies which help reduce the high numbers of young men in the criminal justice system, for example, or that reduce the number of children who fall victim to crime contribute to safer communities and better outcomes for our young people.
- 3.4 We have adopted a proactive approach to youth crime, which aims to improve prevention and early intervention activity, helping to remove barriers for some young people and their families, provide support where it is needed and help young people make the right choices in life. This is balanced with maintaining and developing strong enforcement activity to tackle those who persist in causing misery and upset to the communities in which they live. Alongside this, the YCAP recognises that, for the small minority who end up in custody, more needs to be done to improve the education and training they receive whilst locked up, and more help needs to be given to them to progress into useful and law abiding lives on their release.
- 3.5 The Youth Crime Action Plan has been informed by the views of young people themselves, the public, frontline practitioners, the charity sector and academic research. The evidence gathering has involved:
  - detailed field visits to local areas to establish how youth crime is currently tackled
  - a series of workshops with frontline practitioners and third sector charities
  - desk research of key academic work in the criminal justice field and consultations with key academics
  - consultations with young people (in conjunction with Rainer Crime Concern)
  - consultation on issues affecting education for offenders including a 3 month consultation on the issues during summer 2007 ('Education for young people supervised by the youth justice system: A consultation')

and within the White Paper consultation from March 2008 ('Raising Expectations: Enabling the system to deliver').

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- research into public views on youth crime and perceptions of young people

3.6 This has built on recent research and consultations with young people about crime, including:

- The Metropolitan Police Authority's "Youth Scrutiny Report", May 2008
- NCH: "Step Inside our Shoes: Young people's views on gun and knife crime", April 2008
- Victim Support: "Hoodie or Goodie? The link between violent victimisation and offending in young people", September 2007

3.7 Our work has also drawn on the research undertaken for recent key government publications on young people and crime, including:

- *Engaging Communities in Fighting Crime: A review by Louise Casey*, June 2008
- The Youth Taskforce Action Plan, March 2008
- *Aiming high for young people: a ten year strategy for positive activities*, July 2007 and
- The Staying Safe Action Plan (February 2008)

3.8 We have also considered the report of the Home Affairs Select Committee Inquiry into the disproportionate over representation of young black people in the Criminal Justice System (June 2007) and consider that this plan goes some way towards implementing, in part or in full, a number of the recommendations from that report.

## 4 Assessment and Analysis

4.1 We know that boys, and especially black boys are over-represented in the criminal justice system and in custodial institutions..Figures from the Criminal Justice System shows that nearly 70% of juvenile first time entrants into the system are boys.

4.2 Similarly, YJB data

(<http://www.yjb.gov.uk/Publications/Scripts/prodView.asp?idproduct=376&eP>) shows that black young people are overly represented in the CJS. When looking at data on school exclusions (<http://www.dfes.gov.uk/rsgateway/DB/SFR/s000793/index.shtml>), we see that boys accounted for approximately 80% of the 8680 permanent exclusions from school in 2006/07.

### **Example: Tackling Gangs Action Programme**

Gang activity, which is predominantly a young people's activity (nearly all gang members are under 30) a number of diversity issues come into sharp focus:

#### **Gender:**

Gender is a highly significant factor with regard to perpetrating gang-related gun violence – 97% of the gang members identified by the Tackling Gangs Action Programme police forces were male. Most victims are also male.

#### **Age:**

Evidence suggests that: approximately two thirds (63%) of young people aged 10 to 19 who belonged to a 'delinquent youth group' (a self defined group which was involved in some form of criminal activity at some point in time), have, themselves, committed at least one 'core offence' *in the last year*. This proportion was significantly higher (2.4 times) than for non-members (26%).<sup>1</sup>

Age is known to be particularly significant in relation to crimes involving weapons with young people being disproportionately represented.

#### **Ethnicity:**

TGAP's research programme asked police forces in the TGAP areas to nominate top gang members. This found that:

- in London 86% of gang members were Black Caribbean
- in Manchester, 87% of gang members were Black Caribbean
- in the West Midlands, 93% of gang members were Black Caribbean
- in Liverpool, 96% of gang members were White.

#### **Socio-economic background**

Gun-enabled crime and involvement in gangs is highest in neighbourhoods with high levels of deprivation and social exclusion; and evidence suggests that offenders tend to come from poorer backgrounds, with low family incomes. Gang members are often known to homelessness services; have high levels of school exclusion; are often on benefits; and, are often single parents.

- 4.3 The Home Select Committee report into over-representation of young black people in the Criminal Justice System sought to keep the statistics in perspective. They explained that in 84.7% of offences in 2004–05 involving young offenders aged 10–17, the young people involved classified their ethnicity as white. Over 92% of young black people in the year 2003–04 were not subject to disposals in the youth justice system. Robbery offences, for which young black people are particularly overrepresented, nonetheless constitute only 1.8% of juvenile offending. Robbery offences committed by black young people represent less than 0.5% of all offences overall.
- 4.4 We have not identified any disproportionate representation of disabled people either committing, or being victims of crime. We will continue to monitor this.
- 4.5 Developing a comprehensive and cohesive strategy to tackle youth crime allows us the opportunity to consider how to take steps to redress the balance for those communities and individuals blighted by crime, anti-social behaviour and disorder and to address the over-representation of certain groups in the criminal justice system.
- 4.6 The EIA process allows us to embed and integrate equality issues into the heart of policy making, and underlines the Government's commitment to Equality & Diversity at the outset. The principles of community engagement, sector development, and improving local responses to local priorities are included strongly throughout the YCAP and allow us to make positive steps to tackle crime and disorder whilst recognising and addressing historical inequalities.
- 4.7 The policies in the YCAP are intended to tackle offending and re-offending by young people. They are not designed to single out any individual or family on the basis of, for example, race or socio-economic status. They are designed and intended to raise the expectations and outlook for people whose lives are affected negatively by crime. They are designed to provide support and guidance where needed, and strong enforcement and sanctions where required, to help all young people make the most of the opportunities available to them, and to guide and support families with problems through difficult choices and times, regardless of their backgrounds or circumstances. The key principle is to deliver an appropriate and timely response to need or action for all children, young people and families. It is a fact that since certain groups are over-represented in the criminal justice system, policies intended to reduce offending and re-offending will have a disproportionate but beneficial impact on some groups.
- 4.8 The YCAP recognises that a blanket strategy across the country is not sufficient to tackle the problem of youth crime, and that pockets of criminal

and anti-social activity across the country require a more targeted response. That is why the plan contains a multi-tier approach with a basic national package of activity supplemented by more targeted activity in those areas which require it. The Equality Impact Assessment recognises from the outset, therefore, that the plan will not impact across the country in a uniform fashion. We will shortly be inviting between 60 and 70 local authorities to work with us to deliver the full youth crime package, balancing prevention and enforcement elements to tackle youth offending in their areas. We will select areas using factors such as the actual and perceived levels of youth crime in the area, levels of deprivation and truancy. The remaining 84 areas will be invited to deliver the prevention elements of the package (intensive family intervention and think family systems reform). Each area will be offered funding and expert practitioner support to facilitate delivery.

- 4.9 The localism agenda requires the Government and its partners to be flexible and responsive to local need in the allocation of support, and resources. Existing performance management processes (PSAs, LAAs and APACS) will be used to performance manage the proposals in the YCAP, and we do not intend to introduce excessive new or burdensome monitoring systems on delivery partners by which to evaluate progress. It is worth noting, though, that there is a specific LAA indicator relating to monitor and achieve better proportionality in the ethnic composition of offenders on youth justice system disposals. Performance against this indicator will allow us to monitor the effectiveness of YCAP policy in tackling racial inequality. In delivering the national package outlined in the YCAP, we will expect and encourage each area to have due regard to equality and diversity when identifying local needs and planning solutions, based on the characteristics of their respective local populations.
- 4.10 We continue to expect police, local authorities and other partners to fully consider equality issues in their local delivery plans, and in selecting the package of interventions that they wish to implement, to do so in due regard of equality issues, and with due consideration of any disproportionate or prejudicial impacts. In addition, we continue to expect delivery partners to consider any unintended negative consequences that might arise through their implementation activity.
- 4.11 Equality and diversity considerations run through all major strands of YCAP and we will incorporate strong and clear messages about our expectations relating to diversity as we develop our implementation plan and our next steps:

## Enforcement

- 4.12 Chapter 1 of the YCAP addresses dealing with unacceptable behaviour. When considering enforcement activity and offending it is crucial that criminal justice and enforcement agencies work closely with children's services, schools and youth services to ensure that positive work with young people is maximised. We will expect local agencies to tailor their responses to the needs of individuals, taking account of their needs and circumstances, and offering facilities and services that are appropriate and take account of cultural difference.
- 4.13 We will encourage and expect Criminal justice agencies to build stronger community engagement links, working with young people, their parents and the wider community to tackle negative or discriminatory perceptions to tackle negative or discriminatory perceptions, particularly against young black men, which could impede the willingness of some communities to work with enforcement agencies. In the YCAP the Government, the Association of Chief Police Officers and the Association of Police Authorities re-iterate their commitment to engage all young people and improve the relationship between them and the police. It commits to supporting criminal justice agencies to meet their obligations to engage with communities by spreading good practice. Interventions in the plan such as the expansion of Safer Schools Partnerships help foster stronger relationships between the police and young people as well as improving the safety and security of pupils, the school grounds and property and the surrounding area.

## Prevention

- 4.14 Chapter 2 of the YCAP includes a set of proposals around closer working with families of young people believed to be at greater risk of committing crime. The aim is to prevent problems escalating and to divert young people away from criminal behaviour. The proposals build on previous experience of working with families of young people at risk of, or already involved with, criminal behaviour. The Respect Taskforce (now Youth Taskforce) has a track record of facilitating such family projects, and are familiar and well versed in related equality and diversity issues.
- 4.15 Looking at work with families, evidence demonstrates that Family Intervention Programmes work with families with high levels of ASB, often combined with criminal activities, and who were homeless, or at risk of becoming homeless, because of their behaviour. Between February and October 2007, 885 families were referred to FIPs. These included 1,624 adults aged 16 or over and 2,285 children aged under 16<sup>1</sup>. Seventy-eight per

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<sup>1</sup> In addition there were 109 family members whose age was not recorded.

cent of these families were offered and agreed to work with a FIP, while the remaining 22 per cent were not considered suitable at the referral stage.

4.16 In terms of soci—economic status, FIP families were over-represented in most disadvantaged groups:

- Sixty-nine per cent were headed by a lone parent. Fifty-six per cent of these families had three or more children.
- The proportion of workless households among FIP families was well above the national average (with the respective figures being 62 per cent and 15 per cent), and also reflects the high proportion of FIP families who received out-of-work benefits (61 per cent).
- Just under a quarter (24 per cent) of FIP families were reported to be in debt at the time they were referred. In 74 per cent of these cases the debt included rent arrears.

4.17 In terms of other equality issues, Looking at individuals in FIP families, we found that:

- Ninety-one per cent of family members were white which is in line with the national average. However, given the profile of FIP families (e.g. high proportion of lone parents, large families), white families seem to be over-represented.

#### Ethnicity of family members reported by FIP staff at referral

	<b>Offered and accepted intervention</b>	<b>Not considered suitable for intervention</b>	<b>Column % All families</b>
White	91	75	88
Black	2	3	2
Asian	2	5	2
Other/mixed race	6	17	8
<i>Total number of individuals</i>	<i>3,246</i>	<i>772</i>	<i>4,018</i>

- Sixty-two per cent of adults (i.e. aged 16 and over) were women, reflecting the high proportion of FIP families who were headed by a lone female parent.

- The largest group of adults (37 per cent) were reported to be unemployed, with only eight per cent in work (Table 3.5), largely reflecting the predominance of workless families discussed above.

#### 4.18 Analysis of family members shows that:

- The proportion of Black and Asian people among families not considered suitable for a FIP was double that among FIP family members (eight and four per cent respectively). We will work with local authorities to ensure that the assessment of suitability for extended intensive family intervention is robust and consistent.
- While intensive family intervention is never targeted at families on the basis of race, class, or other such criteria, and will be focused on families where children exhibit the greatest risk of becoming future prolific offenders, by definition it is likely that certain socio-economic groups – or families where children have particular behavioural or other difficulties will be disproportionately represented and will therefore benefit from intensive support more than other groups.

4.19 Given that there are higher offending rates among boys and particular ethnic groups, these young people are particularly likely to be affected by the proposals set out in the YCAP. This could also mean that such families or these groups of young people are more likely to be targeted for early intervention when young people are judged to be at risk of offending, but before a crime has been committed. If these proposals are successful in reducing crime by intervening early, it is expected that it will disproportionately benefit young people from these communities.

4.20 Chapter 2 also pledges to make permanent exclusion from school an automatic trigger for a comprehensive needs assessment and support to meet identified needs. When looking at data on school exclusions (<http://www.dfes.gov.uk/rsgateway/DB/SFR/s000793/index.shtml>), we see that boys accounted for approximately 80% of the 8680 permanent exclusions from school in 2006/07. Pupils with special educational needs are over nine times more likely to have been excluded than the rest of the school population. By making school exclusion an automatic trigger for a CAF assessment, this will have a disproportionately positive impact on these groups, although we would clearly want exclusion to be a last resort, and for poor behaviour to trigger interventions at a much earlier stage. More generally, we expect local authorities and their partners to ensure that services for children, young people and families are responsive to diverse patterns of family life and to children and young people from diverse backgrounds with diverse needs. Educational messages and support services should be provided fairly and using more imaginative and flexible

formats. We also expect local authorities and their partners to involve young people in planning and delivery of services and to ensure that staff who come into contact with the public are appropriately and routinely trained in equality and diversity issues. We will continue to make this clear as we roll out guidance to local authorities on implementing the measures in the youth crime action plan.

## **Victims**

- 4.21 Chapter 3 of the Youth Crime Action Plan addresses the issue of young victims of crime. Youth crime means young victims. Young people can be victims of crime as well as the perpetrators. In fact they are more likely than adults to be victims of crime. Our criminal justice system aims to 'put the victim at the centre'. However, many young people do not report crime, are not involved in the justice system and are therefore not accessing the support on offer to them.
- 4.22 We know that there is an overlap between young victims of crime and young offenders (50% of young offenders had also been victims of crime in the last year). Therefore, by addressing victimisation in the YCAP we are also addressing the wider issue of youth offending. The victims pilot projects outlined in the YCAP will be expected to take account of equality and diversity issues, and through them will disseminate good practice in meeting the diverse needs of individuals.
- 4.23 The Home Select Committee also found that overall, black people are 5.5 times more likely than white people to be a victim of homicide. Their analysis of data from the Metropolitan Police Service demonstrated that in London, the largest numbers of homicides in the black group are of males aged 21 to 30, but the greatest disproportionality is at younger ages, where black males account for nearly two thirds of all murders of 10 to 17 year olds
- 4.24 Youth victimisation peaks at age 12-13 with a third of young people of that age saying they were a victim of crime in the year leading up to the survey (OCJS). Furthermore, young people are far more likely to know the perpetrator of the offence. 86% of 10-15 year olds who were victims of assault without injury knew their attacker. This can lead to young people not reporting crimes to the police. Only 7% of victims aged 10-15 reported the crime to the police (compared to 35% of adults). The British Crime Survey will be extended to under 16s. It is undergoing developmental and piloting work and the intention is to introduce the under 16 survey in the BCS in January 2009 and to collect data on age, sex, ethnicity, religion and disability.

## Justice

4.25 Chapter 4 of the Plan covers the topics of Sentencing and Custody. We know that there are differential patterns in custodial and community sentencing between different ethnic groups. For example, YJB figures show that substantially higher proportions of black and mixed-parentage males had been sentenced to a more restrictive community penalty than white, Asian or other ethnicity male offenders. These differences were found mainly in cases involving young people aged between 12 and 15. Controlling for case characteristics, it was found that white young men were sentenced to a more restrictive community penalty at a lower rate than would have been expected from their case characteristics. All cases involving young men from minority ethnic groups were sentenced to more restrictive community penalties at a higher rate than would have been expected (although only in the case of mixed-parentage was the difference statistically significant).

4.26 The Home Affairs Select Committee found that black people of all ages are three times more likely to be arrested than white people. Black people constitute 2.7% of the population aged 10–17, but represent 8.5% of all those arrested in England and Wales.<sup>31</sup> Black people are just over six times more likely to be stopped and searched by the police than white people, although this may partly reflect the fact that three quarters of stops and searches take place in London.

4.27 The Youth Justice Board (YJB) research *Differences and Discrimination* (2004) looked in part at whether there was differential or discriminatory treatment towards minority ethnic young people at different stages of the youth justice process. Conclusions from the study raise concerns about discriminatory treatment. The following points are a sample of some of the findings:

- The higher rate of prosecution and conviction of mixed parentage males.
- The higher proportion of prosecutions involving black young males.
- The greater proportion of black and Asian males that had been remanded in custody before sentence, especially the greater proportion of black males remanded whose proceedings had not resulted in a conviction.
- The slightly greater use of custody for Asian males.
- The greater use of more restrictive community penalties for Asian and mixed parentage males, especially those aged 12 to 15.
- A greater likelihood that black and Asian males aged 12 to 15 would, if they received one of the more restrictive types of community sentences, be under supervision for longer than 12 months.
- A slightly greater propensity for ethnic minorities to have been committed to the Crown Court.

4.28 The provisions in the YCAP relating to justice, sentencing and custody are designed to provide a fair, effective, and balanced system, which will ultimately both appropriately punish, and effectively resettle young offenders and provide positive support for their rehabilitation and resettlement, regardless of their ethnicity. We will continue to monitor the effectiveness of these systems on reducing re-offending through the indicators in the National Indicator set.

4.29 In terms of sentencing itself there are already safeguards in place that ensure that the courts must have regard to the welfare of the young person as part of the sentencing process. We have further strengthened this safeguard by legislating for statutory purposes of sentencing for under 18s as part of the Criminal Justice and Immigration Act. When sentencing a young person the Courts will have to have equal regard to the principle aim of the Youth Justice System – which is the prevention of offending or re-offending by young people, the welfare of the young person and the stated purposes of sentencing which are –

- The punishment of offenders
- The reform and rehabilitation of offenders
- The protection of the public, and
- The making of reparation by offenders to person affected by their offences.

We consider that by ensuring that ‘welfare’ is taken into account at sentencing the complex needs of individual offenders will be considered before they are given a sentence. This means that each sentence will reflect the needs of the individual.

4.30 Furthermore, with regard to age, the proposals and policies throughout the YCAP can be said to have a positive impact. The YCAP provides the Government with an additional opportunity to divert a young person away from criminal activity or further offending and also, in appropriate cases, enables support structures to be put in place to help that diversion. Where a young person has committed an offence we have in place a range of community sentencing options which can be tailored to the needs of the young person. We have legislated for the Youth Rehabilitation Order which will replace nine existing community sentences. This will provide a more risk based approach to community sentencing including a range of requirements which can be tailored to the young person and his or her offending behaviour. The YRO will promote effective rehabilitation and could, for example, include mental health treatment or treatment for drug and substance misuse where this has been identified.

## **Breaking the cycle of crime**

- 4.31 Chapter 5 sets out a range of proposals to better meet the personal needs of young offenders. It recognises that we must ensure young offenders underlying problems and needs are tackled through a joint approach between mainstream children's services and those working in youth justice services and that the provision for each child is tailored to reflect their individual needs.
- 4.32 The proposals are based on principles of ensuring equality of outcomes for young offenders, to ensure that children in the YJS achieve the five Every Child Matters outcomes, in the same way as is expected for any other child. Proposals for consultation on a comprehensive package of support for children leaving custody are modelled on support packages currently delivered for other vulnerable groups such as Children in Care.
- 4.33 The plans for improving education for young offenders are designed to bring greater equality in terms of young offenders rights and access to education, training and related support services, so that they are comparable to the provision for young people in mainstream education. Wider proposals covering accommodation, financial support and on resettlement provision are designed to better meet the personal needs of young offenders. Equality of access is at the heart of these reforms.

## **Making it happen**

- 4.34 Chapter 6 sets out how local partnerships need to work together to deliver reductions in youth crime in line with the local authority performance framework. Local areas produce children and young people's plans which set out the authority's strategy for discharging their functions in relation to children and young people. These – and other partnership plans – should be prepared with full consideration of equal opportunities issues. . For example the statutory guidance on Children and Young People's Plans says
- *Local authorities and their partners should ensure that equality and diversity are promoted in all their work with children, young people and families, and seek greater progress towards these outcomes for disadvantaged children.*

## **Communication**

- 4.35 Any guidance or good practise published as a result of the YCAP will recognise the importance of tailored ways of reaching and involving young people, parents and communities and take full account of the impact on

various groups including reaching young and disaffected people, minority ethnic groups, people in newly arrived communities, women's groups and people in LGBT groups.

- 4.36 Continuing engagement with a range of stakeholders (including young people and delivery partners) will be crucial to implementation.

### **Possible negative impacts**

- 4.37 There is always a risk in a plan of the nature of the YCAP that concentrating on one aspect of an issue or a problem, might be at the expense of a different aspect. For example, an action that concentrates on dealing with the behaviour of young offenders, presents a risk that victims of crime receive less attention. However the YCAP has been carefully written to provide a balanced approach to deal with such risks.
- 4.38 This risk of unintended consequences is one to be aware of and we will ensure that we maintain and develop our awareness of this as the Plan is implemented. We will ensure that equality risks are picked up and identified in our risk register as we take this forward.
- 4.39 With regard to equality, there is always a risk around relying on the professionalism of various personnel – however, the police, youth custody officers, court workers, the judiciary, teachers, youth workers etc – are all subject to equality and diversity training, and should be knowledgeable about the various ways in which equality target groups are institutionally disadvantaged.

## **5 Recommendations**

- 5.1 Many of the points raised during the various stakeholder and consultation exercises are now incorporated into the Youth Crime Action Plan. Some of the specific and more detailed points outlined in this EIA will be carefully considered when developing an implementation plan for the YCAP, and when working with partners at a local level.
- 5.2 This will include expecting local authorities and other delivery partners to consider equality issues in their delivery plan. Key equality issues around age, ethnicity and gender (e.g. over-representation of young black men in the criminal justice system) will need to be the focus of the ongoing consideration.
- 5.3 As part of the implementation process, local areas will also be encouraged to consider commissioning small local research projects if any areas are identified that require further data locally. The Home Affairs Select Committee report into young black people in the CJS provides a sound and useful starting point for any further work. The Youth Crime Action Plan underpins and supports the implementation of a number of the recommendations of the HASC report in its likely positive impacts on young black men.
- 5.4 A delivery board at official level will be set up that will maintain an oversight of the equality and diversity issues of this programme of work. In addition, an action plan has been drawn up to support the implementation of this Plan, and will be maintained and updated as the implementation progresses.

## **6 Date of EIA Report**

- 6.1 18 July 2008.