

EQUALITY IMPACT ASSESSMENT WORKBOOK



Department:	Professional Standards
Corporate Document(s) this Equality Impact Assessment Relates to:	Disclosable Associations
Associated Documents:	

Equality Impact Assessment	
Developed By	Policy Officer
Part One Initial Assessment Approved By	Head of Professional Standards Department
Part Two Full Assessment Approved By	N/A
Date Published:	January 2013
Review Date:	January 2015
Version Control:	V1

Date Reviewed	Name and Job Title of Reviewer
[Insert date]	[Insert name and job title]

PART ONE

INITIAL EQUALITY IMPACT ASSESSMENT AND SIGNIFICANCE TEST

The Initial Equality Impact Assessment and Significance Test templates should be completed prior to seeking authority to proceed with the development of the following documents:

- Strategies
- Plans, including Contingency Plans
- Project Initiation Documents
- Policies and Procedures

The Initial Equality Impact Assessment and Significance Test grading will always be agreed by three people. This will give integrity and consistency to the process and will draw on the experience, knowledge and common sense judgement of more than a single individual. The following will usually be the posts involved in the process;

Policy and Procedure

- Policy or Procedure Owner or Holder
- Policy Officer
- Diversity Officer

Other Corporate Documents

- Corporate Document Owner
- Corporate Document Developer
- Diversity Officer

Advice on the types of information available to assist in the completion of the templates can be obtained from the Policy or Diversity Units.

It is recognised that there will be occasions when the knowledge and experience of the staff members involved in the Equality Impact Assessment process will be such that there may not be a need to undertake any initial research or consultation in order to complete the Initial Equality Impact Assessment. This is acceptable provided that the reasons are accurately recorded in the workbook.

INITIAL EQUALITY IMPACT ASSESSMENT TEMPLATE

1.1 Summarise the main aim(s) or purpose of the corporate document.

Main aim(s) or purpose, including any benefits or outcomes	Date
The aims and objectives of this policy are to identify and address any apparent or suspected 'disclosable associations' between Norfolk or Suffolk Constabularies' personnel and other individuals or organisations, in order to prevent any actual or potential compromise of policing functions, to protect the integrity of both Norfolk and Suffolk Constabularies and personnel and to maintain the operational effectiveness and reputation of both Constabularies.	17/12/12

1.2 Identify individuals and organisations internally and externally that are likely to have an interest in, or be affected by, the corporate document. Where a review is being undertaken, if appropriate, highlight any changes to who might have an interest in the document.

Interested individuals and organisations	Date
Internal	
All members of police personnel have a duty to report all 'disclosable associations' which they suspect, or of which they become aware, to the Professional Standards Department (PSD).	17/12/12
External	
Members of the public, especially those who have an interest in making sure the Constabularies' reputation and integrity is upheld.	17/12/12

1.3 Who implements the corporate document and who is responsible for the corporate document?

This includes shared documents, documents that affect contractors or other public or private bodies: for example Group 4 Security, Multi Agency Protocol or PFI.

All police personnel are responsible for ensuring they adhere to the policy and disclose any potentially conflicting associations. The Professional Standards department own the policy and are responsible for ensuring any disclosed associations are properly assessed and recorded.

1.4 What factors could contribute or detract from the outcomes?

If the policy is not adhered to the Constabularies' integrity could be in disrepute and this could affect people's trust in the Constabularies. In contrast, where the policy is followed and adhered to and police personnel are open and honest, this will help to portray the Constabularies as being trustworthy and reputable organisations.

1.5 Are there any concerns that the corporate document could have a differential impact on any of the following groups and is there evidence to support this?

Group	Yes	No	Evidence	Date
Age		✓	No evidence, however as all associations are assessed against the same criteria (of which equality does not constitute a part of) and are either approved or not depending on the potential impact those associations could have on the Forces, there is nothing evident in the policy which would differentially impact on any of these groups	17/12/12
Disability		✓		
Gender reassignment		✓		
Marriage and civil partnership		✓		
Pregnancy and maternity		✓		
Race		✓		
Religion or belief		✓		
Sex		✓		
Sexual orientation		✓		
Family Status e.g. dependants or caring responsibilities		✓		
Economic Status		✓		

1.6 Could the differential impact identified in 1.5 above amount to there being potential for adverse impact and, if so, can this be justified on any of the following grounds:

- promoting good relations between diverse communities;
- promoting equality of opportunity;
- eliminating unlawful discrimination;
- eliminating unlawful harassment;
- encouraging participation in public life;
- addressing the specific needs of disabled people.

	Yes	No	Reason	Date
Is there potential for adverse impact?		✓	No differential impact identified to amount to adverse impact.	17/12/12
Can this adverse impact be justified?	N/A		No adverse impact identified to be justified.	

SIGNIFICANCE OF INITIAL EQUALITY IMPACT ASSESSMENT

Based on the information provided in the Initial Equality Impact Assessment template, assess the significance of the impact as either Low, Medium or High.

Guide to assessing significance:

Low – where the answer in respect of all eleven groups in 1.5 above is ‘no’;

Medium – where the answer in respect of between one and four groups in 1.5 above is ‘yes’. However, if the likely adverse impact on any or all of those groups is considered to be particularly significant, it may be appropriate to classify the significance as High;

High – where the answer in respect of between five and eleven groups in 1.5 above is ‘yes’ or where the likely adverse impact on one or more groups is considered particularly significant.

Low: No further assessment required and review every three years.	✓
Medium: Requires Full Equality Impact Assessment and relevant consultation in year one and bi-annual review.	
High: Requires Full Equality Impact Assessment and relevant consultation in year one and annual review.	

Equality Impact Assessment – Low Significance

Those corporate documents identified as having a low significance will be developed without the need to complete a Full Equality Impact Assessment. However, if during the course of the corporate document process equality issues are identified then the Initial Impact Assessment and Significance Test should be repeated.

Equality Impact Assessment – Medium and High Significance

The Full Equality Impact Assessment process will commence when approval has been given to develop the corporate document.

The Initial Equality Impact Assessment Template and Significance of Initial Equality Impact Assessment were completed by:

Name:

Position: Policy Officer

Date: 17/12/2012

Name:

Position: Senior Diversity Assistant

Date: 07/01/2013

Name:

Position: Head of Professional Standards Dept

Date: 07/01/2013

PART TWO**FULL EQUALITY IMPACT ASSESSMENT**

All questions should be considered from the perspective of all diversity strands, i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and from the perspective of family status e.g. dependants or caring responsibilities and economic status.

2.1 Research

1. What monitoring arrangements are in place? (With new corporate documents there may be no arrangements in place, in which case go to question 2)	
2. What quantitative data has been considered?	
3. What qualitative information has been considered?	
4. Is there a public concern regarding the subject of the corporate document? If so, describe how these concerns have been identified	
5. Provide details of any changes in legislation or national guidance affecting the corporate document	
6. Summarise the findings	
7. Have gaps in the research or data been identified?	
8. Has the corporate	

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document been amended in light of the research findings?	
9. Outline any plans for further research or data collection	

2.2 Consultation

10. Which individuals and organisations internally and externally were consulted or involved and how were they consulted or involved?	
11. Have consultees been informed of the results of consultation or involvement and by what means?	
12. Summarise the key findings or outcomes of the consultation or involvement	
13. Has the corporate document been amended in light of the consultation or involvement?	
14. Is there a need for further consultation?	
The results of consultation should be recorded in Appendix A	

2.3 Equality Analysis and Review

15. Is there any evidence that the corporate document could be perceived as discriminatory or could damage good relations between people of different groups?	
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16. What might the negative implications of the corporate document be for the public or Constabulary staff?	
17. What might the positive implications of the corporate document be for the public or Constabulary staff?	
18. Is there any evidence that the corporate document has an adverse impact, directly or indirectly, on any members of the public or Constabulary staff?	
19. What changes, if any, have been made to the corporate document as a result of the Equality Impact Assessment to reduce adverse impact?	
20. What changes, if any, were considered but not implemented?	
21. If the potential remains for the corporate document to have a negative impact on members of one or more groups, explain why implementation is to continue and can this be justified?	
22. If your assessment is that the corporate document is likely to have an adverse impact is there an alternative means of achieving the document's aim, objective or outcome?	

23. What changes, if any, need to be made in order to minimise unjustifiable adverse impact?	
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2.4 Monitoring

24. What arrangements have been made to monitor the corporate document? Please identify monitoring review dates	
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2.5 Summary

25. Please provide a summary of the findings of the Equality Impact Assessment against the corporate document under each of the eleven diversity strands. This summary will be used by the Constabulary to inform the public and will become a public document.	
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PART THREE

FINAL APPROVAL AND SIGN OFF

Assessment completed by:

Name:

Position:

Date

Signed by Corporate Document Holder:

I am satisfied that [Name of Corporate Document) has been fully Equality Impact Assessed.

Name:

Position:

Date:

Appendix A: Equality Impact Assessment Consultation Record

Consultee	Comment	Action
Norfolk Unison	<p>I'm not sure that the bullet point below from point 2.3 explains itself as I wouldn't know if I was in such a group:</p> <ul style="list-style-type: none"> Being a member of a group, organisation or society, which is formed for the promotion of a common objective. <p>Perhaps you can elaborate for me?</p>	This bullet point has been removed
Suffolk Unison	<p>Paragraph 2.3: I don't believe this is clear enough needs some examples i.e. Meeting or uniting for a common purpose; going to a weekly football match, part of the local Darts team</p>	Added in examples of: 'Member of sports team or organised club'
	<p>Paragraph 4.2: A lot of people fall down on this as they believe if they have been vetted and they have named partners or friendships then they have DISCLOSED</p>	Accepted, but it is individual's responsibility to ensure they read and understand Force policies and adhere to them. Have made the sentence bold to highlight the point.
	<p>Paragraphs 4.3 & 4.6: The first 5 points may only be known through a CIS check which an individual is not allowed to do unless under "Policing Purposes" we are not allowed to "check out our friends"</p>	The policy is stating that where personnel 'know, consider or suspect' then they must disclose. Where the association is not known, considered or suspected, there is no responsibility to disclose.
Norfolk Police Federation	<p>There is nothing in this document that recognises that the work of the federation is classed as 'official police business' and we would suggest it needs to be.</p>	Clarification that staff association business is included has been added to paragraph 2.1.
	<p>Federation Reps will have regular contact with officers that have been charged with a criminal offence and the subject of a current prosecution. They will also have contact after an officer has been required to resign etc.</p>	This would be classed as official police business. Clarified in paragraph 2.1 as above.

Norfolk Police Federation (cont.)	Para 4.3: the bullet points require clarification in respect of staff association official business. However if para 2.1 is amended to include staff association business as 'official police business', this issue is resolved.	Official police business would include staff association official business. Paragraph 2.1 amended as per above action.
	Para 4.6: This would be another opportunity to highlight: <ul style="list-style-type: none"> • how to ensure, for example, new relationships are ok i.e. consult line manager or PSD & • 'Think before you click' 	No action taken – not considered necessary for this policy.
	Para 6.1 third bullet point – does this include speeding and due care convictions?	No – Added to bullet point for clarification.
	Para 6.4 – the phrase 'to attend an interview' could be perceived as a misconduct interview. Should the term 'meeting' be used or can this be clarified.	'Interview' amended to 'meeting'
	Para 10.7. – if this is a misconduct issue is the final decision not with the PCC now?	No, the final decision rests with the DCC
	At the time this policy is published will clear instructions be published in respect of current serving officers and staff who have in the past declared a disclosable association.	Yes
Norfolk Supt Assoc	All responded with no comments.	No action required.
The Office of the PCC (Suffolk)		
Suffolk Diversity Unit		
Suffolk Reach Out		