

MPA Equalities Impact Assessment Proforma

Statutory responsibility for Equality Impact Assessment

The MPA is required, under the Race Relations (Amendment) Act 2000, to assess each proposed and policies for relevance to the Act. This Performa is designed to assist with this process.

Definition of a Policy

The Home Office and the CRE have defined a policy as ‘any practice or written document which sets out a course of action, guiding principles or procedure which is adopted and implemented by the Authority. This includes and decision taken or recommendations made at meetings which may lead to action to implement’. Within the HO and CRE definition, we will therefore need to impact assess those decisions taken or recommendations other than formal written policies. This will require each Unit or Policy Lead taking responsibility for identifying the policies, decisions and recommendations and carrying out the initial assessment to identify whether a full impact assessment needs to be carried out. The process for this is outlined below.

When should an EIA be carried out?

The EIA should be an integral part of policy/decision/ recommendation-making and should therefore begin as soon as a **relevant new or proposed policy/decision or recommendation** has been agreed. This will be the responsibility of each Unit or Policy Lead.

Stage 1 – Initial screening for Equality Impact Assessment

At this stage, the following questions needs to be considered:

Name of Policy: Induction			
		Yes	No
1	Is there evidence or reason to believe that there is likely to be higher or lower impact on different groups as a result of this proposed or new policy?	H X	L
2	Is there evidence or other reason to believe that different groups have different needs and experiences that this policy is likely to address in meeting the General or Specific Duty of the Act?	Yes X	No
3	Does the policy propose changes or alterations to a policy that has been known to impact differently on various Racial or Equality Groups?	Yes	No X
4	Has prior consultation take place with organisations, groups or individuals, which indicate a problem that the policy is likely to address?	Yes X	No
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On completion, this form should be forwarded, electronically, to Cynthia Coleman in the Race and Diversity Unit

Date Stage 1 form forwarded to Race and Diversity Unit: _____

Name of Lead Officer responsible for the EIA: Yvonne Peart

External Quality Assurance

Date External Quality Assurance completed: _____

Sign-Off and Publication

Assessment signed off by Clerk _____ Date _____

Date forwarded to Comms for publication: _____

Publication date: _____ (To be agreed with Communications Unit)

Monitoring and Review

Date for reviewing policy: _____ (to be agreed with R&D Unit)

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Stage 2 – FULL IMPACT ASSESSMENT

A full EIA will be needed if the initial assessment has identified the potential for impact. It is suggested that the assessment should be carried out by at least three people and that at least one should be from the CDO Unit, to give any expert advice on the RES process. The completed assessments will be quality assured by a small team to include the SMT, Head of CDO Unit representative from Internal Audit (objective assessment) and Unit responsible for the assessment.

Name of Policy Impact Assessor: Yvonne Peart

Department/Section: Human Resources

Date Impact Assessment completed: 11 March 2004

Date of policy being reviewed: 16 March 2004

Name of Policy: Induction

Policy, Aims and Purpose**1. What is the aim and purpose of the policy?**

The Induction Policy is incorporated into the MPA policies on Developing People. The MPA HR Department have carried out significant work on the development of this policy and an Induction Pack was introduced in June 2003. The aim of the policy is to support, train and encourage new starters during their first six months of employment. The 'Head of section' is responsible for providing, or coordinating guidance and effective support for the new starters personal development and has a key role in providing assessment throughout the induction programme.

The MPA is committed to ensuring that all new starters are properly inducted into the organisation, their department and job. It also acknowledges that in order for the Authority to be effective, each member of staff needs to feel that the job is interesting, valuable and enjoyable.

The induction programme aims to give a general, overall picture of the Authority including its history, general management, personnel matters, staff benefits, equalities, pay and pension, occupational health, security and other important Authority policies including health and safety, fairness at work.

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It combines an individualised programme of monitoring and support-providing opportunities for the new starter to enhance their knowledge and skills. It also encourages staff to take increasing responsibility for the own professional development as the induction support programme progresses

Decommissioning of this policy would have an adverse effect on the Authority and would create the absence of an effective policy to assist staff to be highly efficient in their role. Equally of importance, it would deny the MPA the opportunity to impress upon new starters the ethos of the organisation and the need for them to be committed to its mission, vision and values.

2. Who are the main stakeholders of the Policy or proposed policy? (e.g., MPA, MPS, GLA, HR, Internal Audit etc)

All MPA, HR, MPS employers and employees.

3. Who is the policy or proposed policy intended to benefit?

The policy is intended to provide well-targeted monitoring and support for new starters and also ensure they are aware of their duties and responsibilities with regard to equalities related legislation.

4. How will the policy or proposed policy be implemented and who will be responsible for monitoring and reviewing it? Please be specific.

The head of section has responsibility to ensure that the new starter has an appropriate induction support programme. The HR department will ensure through effective monitoring of the process that all individual strengths and development needs are discussed during the induction process also ensuring that all equal opportunity policies are being actively pursued. The policy will be continually reviewed by the HR department for its effectiveness. The process will be reviewed every three years or sooner if required by changes to legislation, Authority members or SMT.

5. How does this policy or proposed policy inform and contribute to the overall statutory functions and objectives of the MPA?

Through the implementation of the induction policy and pack the new starter will receive information about their rights and responsibilities and those of others involved. It will also ensure that new starters have knowledge of fairness at work and other key policies/legislation that support the Authority's mission, vision and values. The process provides a means of monitoring the mainstreaming of race equality, equal opportunities and diversity principles in all aspects of the business of the Authority.

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6. How will this policy inform or influence the MPA governance of the MPS?

The induction process includes information on MPS issues, including the structure and culture. This provides the new starter with increased understanding of the both the MPA and the MPS in order that they see themselves as part of a wider delivery of service. Thereby giving individual a more strategic overview of organisational structure and their service status.

7. Please give any other comments you wish to make about this policy or proposed policy.

None

Assessing for Impact**8. Is there evidence or reason to believe that some groups could be differently affected by this policy/function (e.g. higher levels of arrests, lower rate of participation? If so which? If so, what is it? (Please refer to any research, findings, statistics, etc where appropriate and attach it to this Performa)**

a. Would people be differently affected by nature of their **age** (children, young people, older people etc)? (Please explain)

Yes. School/college leavers are likely to require special attention during the implementation of the induction policy,

b. Would **people with disabilities** be differently affected by the policy? (Please explain)

Yes. Careful pre-planning would be required to reduce the problems that may arise for employees with disabilities, whether in terms of access, equipment or dealing with colleagues. Specialist advice is available from MPS Occupational Health Directorate

c. Would people of different **faith and or religious** beliefs be differently affected by the policy? (Please explain)

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Yes. Their needs should be considered when making arrangements for venues to hold meetings, consideration should be given to the provision of prayer rooms and special dietary needs.

d. Would people who are **lesbians, gay, bisexual or transgender** be differently affected by the policy? (Please explain)

Yes. The affording of sensitivity and diversity training for the workforce would assist in the provision of a supportive working environment for this group.

e. Would **women** be differently affected by the policy (please explain)

Yes. Women could have special needs with regards to flexible working arrangements.

Please be aware that discrimination may be compounded and is therefore likely to have more adverse impact on some discriminated than others.

9. Is there differential impact on particular racial groups in respect of qualitative or quantitative data? *(Please specify with supporting research and data evidence where appropriate)*

Human Resources unit has reported that due to the small size of the Authority and the variations in the implementation of the induction process it has not been possible to identify a consistent pattern with regards to qualitative data. The variations in implementation of the process does however result in differential impact. There are no targets set that would provide quantitative data.

10. Is the differential impact an adverse one, and for which groups? *(Please list any research or data evidence to support assessment in reference to the listed equalities groups in section 8)*

There is no evidence of differential impact, however, the variations in implementation could result in an adverse differential impact on all the equality groups. It could mean that some new starters may receive a very thorough induction that enables training needs and development opportunities to be identified, while others may have received a poor induction if any at all. Individuals requiring special attention may not be in receipt of this. This would also mean that some individuals are placed at higher risk on health and safety issues.

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11. Would the policy or proposed policy result in indirect discriminatory against any group? (Please specify)

Yes.

Inconsistencies in the implementation of this policy could mean that individuals within all the equality groups are not given support that is appropriate to their needs and therefore subject to indirect discrimination.

12. If the policy is indirectly discriminatory, is it justifiable under the Act? (Please give detailed reason for answer)

No. The differential impact is not intentional.

13. What amendments could be made to the policy to eliminate discrimination, if any has been identified? (Please list the proposed amendments)

The induction checklist should be improved to provide line managers with clear guidance on the implementation of the induction programme. That it be made a compulsory requirement that both the new starter and line managers sign off the induction checklist on completion. Areas for induction are highlighted on the induction checklist to ensure that all staff are inducted to the same standard and made aware of individual/organisational responsibilities. That initial training needs are identified. That the Authority's key legislation and policies are sign posted in the Induction Pack. A timetable proforma be used to plan the induction to the different units in the Authority. That the completed checklist be forwarded to HR with the new starter's 3-month probation report. That all line managers are trained how to implement the induction process. That implementation of the induction process is monitored to ensure that all line managers comply with the policy.

14. In what way does the proposed amendment promote the General Duty of the Act? (Please specify)**Eliminate unlawful discrimination**

Ensure all new starters are aware of the Authority's statutory duties in relation to race legislation. Ensure that there is no discrimination in the Authority, through training and ongoing monitoring and review. The amendments would enable the Authority to highlight possible inequalities, investigate their underlying causes; and remove any unfairness or disadvantage

Promote equal opportunities

Ensure that all new starters receive the same standard (appropriate to their needs) of introductions to their immediate colleagues and other workers, with whom they may have

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less day-to-day contact, including trade union representatives. All new starters are made aware of the training and development opportunities and provided with information on working practices and individual/organisation responsibilities, in particular with regards to equality.

Promote good relations between people from different racial groups

Create a positive inclusive ethos and promote the shared commitment to challenge racism and discrimination and encourage good relations between people of different groups. The Head of Section should also consult with minority racial groups about their experience of the working environment. The amendments would reinforce the diversity strategy ethos.

15. a) What are the consequences for the affected groups, and for the Authority, for adopting a policy that is assessed as being discriminatory?

The consequences are that groups or individuals may choose to leave the Authority because the ineffective induction had resulted in them not 'fitting in' and feeling that they are not supported or knowing how their work contributes to the aims of the Authority. For the Authority this could result in a high turnover of staff and increase the risk of the embarrassment of an employment tribunal

b) How will the MPA communicate its decision to the Community or communities if there is differential impact(s)? Which communities will the outcome be communicated to and how?

It would roll out the improved procedures throughout the organisation.

16. In coming to the above decision, with whom have you consulted/ and or what information was gathered?

The process was the subject of consultation with all MPA staff. It follows the ACAS Recruitment and Induction. The induction process has been the subject of consultation with the representative union.

In carrying out an impact assessment of the MPA induction policy discussions were held with a TU representative, a BPA executive member and MPA staff including a member of the Race & Diversity Unit.

Consideration was given to the recommendations made in MPA Internal Audit Directorate review of Police Staff Induction alongside data from other organisations.

Research was undertaken on the websites of Public Sector Organisations specifically for the purposes of benchmarking. The websites visited were: ACAS, IDEA, Home Office, MPS, Department for Education and Skills (DfES) and Addenbrookes NHS Trust. All these organisations were found to have specific 'induction' policies and the majority of which were similar in their aim to ensure that new employees are effectively integrated into the organisation. Whilst these policies shared comparable data, the DfES provided the best

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benchmark, due to its comprehensiveness in relation to the provision of well-targeted monitoring and support for newly qualified teachers.

Further consultations with staff within the newly established email consultation process took place and the information gathered is detailed below. Due to the recent failure of the external email facility it was not possible to extend the consultation process to MPA members and external participants within the email forum before the review scheduled on 16 March 04. This wider consultation will commence on 16 March 04 and the results fed into this assessment at a later date.

Written comments from members of staff:

The policy should also make reference to those on temporary/fixed term contracts. Temporary staff should have some form of induction in order that they have the equal opportunity to perform to the standards of the job required.

When discussing conduct/capability matters, managers should be advised to pay particular attention to issues of conduct and acceptable behaviour, particularly those that would constitute gross misconduct.

New procedure should be put in place with immediate effect (following appropriate consultation).

The success measures should include reduced turnover, avoid/reduce number of grievance and discipline cases.

HR should also report progress on the implementation of policies/processes and monitoring information on a monthly basis to SMT at the HR focus meeting.

Ensuring a degree of consistency in the process for people on a similar/identical job descriptions. whilst also managers referring to job descriptions when implementing the induction process.

Assuming that probation starts straight after the induction process, part of the induction checklist could prompt for the assessment of individuals' needs and requirements in the probation.

Who checks that the induction process was carried out in full?

Unit heads could have been consulted on the writing of the checklist to see if they had any amendments/additions, which would aid a new starter.

Consequences of discriminatory policies – bad press, disgruntled employees, high staff turnover, ETs, lack of motivation, grievances etc.

The equalities practices and achievements of the MPA can be communicated to all employees internally through the Staff handbook, Induction pack, Staff meetings etc and externally it can be communicated through the Committee Papers, Publication Scheme, Website and general press.

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17. What arrangements have been/will be made for publishing the results of this EIA?

On Website

18. What are the costs of implementing each proposed option?

N/A

19. What are the measures you would expect others to use to assess the success of this policy in meeting the General Duty of the Act? (Please Specify)

From the results and analysis of monitoring and consultation and from any other sources of evidence. Also information on whether staff feel they are treated fairly by MPA members, managers and colleagues and also in terms of training and development.

20. Please outline the arrangements that have been / will be made for monitoring the policy including the Committee or internal structure (e.g. SMT/CDO) that quality assures the outcomes of the monitoring arrangements and success measures?

SMT are responsible for taking the lead in creating a positive, inclusive ethos that challenges racist or inappropriate behaviour on the part of managers and staff. The Head of Human Resources has responsibility to ensure compliance with employment monitoring requirements. The MPA Equal Opportunities and Diversity Board will receive half yearly reports on the overall progress of the implementation of MPA policies and processes. It is in the terms of reference of this Committee to ensure that the MPA meets its statutory responsibilities under all relevant anti-discrimination legislation.

The completed Stage 2 proforma must be forwarded, electronically, to Cynthia Coleman in the Race and Diversity Unit.

Date Stage 2 proforma forwarded to Race and Diversity Unit:

External Quality Assurance

Date External Quality Assurance completed: 16 March 2004

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Sign-Off and Committee notification

Assessment signed off by Clerk: Catherine Crawford Date: 10.10.04

Date to be submitted to the EODB: March 2004

Publication

Publication date: June 2004 (To be agreed with Communications Unit)

Monitoring and Review

Date for reviewing policy: June 2005 (to be agreed with R&D Unit)

For further information and assistance please contact:

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