Equality Impact Assessment Form

Part 1 – Initial Screening

1. Officer(s) & Unit responsible for completing the assessment:
   David Riddle – Deputy Chief Executive

2. Name of the policy, strategy or project:
   MPA Security Policy Statement

3. What is the main purpose or aims of the policy, strategy or project?

   This statement sets out the MPA policy on security relating to the MPA’s premises, and personnel.

   The objectives of the MPA policy are to:
   • Protect the public, our personnel and our assets, including information, from all threats, whether internal or external, deliberate or accidental.
   • Ensure the continuity of our activities by minimising the effect of security incidents
   • Maintain public confidence.

4. Who will be the beneficiaries of the policy/strategy/project?

   All employees and members of the MPA, together with the mps and wider public, as a result of enhanced security for MPA premises, personnel and operations.

5. Has the policy/strategy/project been explained to those it might affect directly or indirectly?

   There has been extensive consultation with staff, the staff side, the race and diversity unit and the MPA staff equalities forum during which the purpose of the policy has been explained and discussed.

6. Have you consulted on this policy?

   See answer to 5 above. The policy has been revised and amended to take account of matters raised during consultations.

   Copies of consultation responses are appended.
Ionann Diversity Consultants were also asked to review the draft policy and their comments have been reflected in amendments to the policy.

7. Please completed the following table and give reasons/comments for where:

(a) The policy/strategy/project could have a positive impact on any of the equality target groups or contributes to promoting equality, equal opportunities and improving relations within equality target groups.

(b) The policy/strategy/project could have a negative impact on any of the equality target groups, i.e. disadvantage them in any way. **If the impact is high, a full EIA should be completed.**

<table>
<thead>
<tr>
<th>Equality Target Group</th>
<th>(a) Positive Impact</th>
<th>(b) Negative Impact</th>
<th>Reason/Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>High</td>
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<tr>
<td></td>
<td>Low</td>
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**Men**

**Women**
| Asian or Asian British people |  | X | The main potential adverse impact arises from the operation of the vetting process itself, and in particular the national counter terrorism check. The outcome of that check is outside the control of the MPA and the MPS. There is a national Appeal Process but in some cases the reason for refusal of vetting is not given to an applicant (in order not to compromise security). Adverse impact may arise as a result of delay in MPA being able to offer appointment to a new recruit. Delay normally occurs where it is necessary for enquiries to be made overseas in connection with the CTC check. This is most likely to affect applicants from black and minority ethnic communities (but not exclusively so). The risk of adverse impact is rated as low because there has not been any case in the existence of the MPA where vetting has been refused. As far as is known, there have been only a few cases in the MPS. The vetting levels and process are defined by Central Government. There is little or no discretion available to the MPS or MPA. The policy includes requirements for monitoring, which will include ethnic and gender monitoring, as a safeguard against abuse. The policy allows for staff to be appointed conditionally without vetting; this is subject to special permission and risk assessment, to safeguard against abuse. The policy includes restrictions on access to parts of the building occupied by Internal Audit, for special security reasons. In one case in the past an employee alleged that this policy was employed in a discriminatory fashion but that contention was not upheld by an MPA Members’ Grievance Panel or by an ET. The Policy provides an appeal mechanism for any staff refused access to those parts of the building, with the appeal decided by SMT. |
| Black or Black British people |  | X | As above |
| Category                                                                 | |                  | X | As above |
|--------------------------------------------------------------------------|---------------------------------|------|---------|
| White people (including Irish people)                                    |                                 |      |         |
| Chinese people                                                           |                                 |      |         |
| Other racial/ethnic group (please specify)                               |                                 |      |         |
| Mixed Race                                                               |                                 |      |         |
| Disabled people                                                          |                                 |      |         |
| Gay, Lesbian and Bisexual people                                         |                                 |      |         |
| Transgender people                                                       |                                 |      |         |
| Older people (50+)                                                       |                                 |      |         |
| Younger people (17-25) and children                                     |                                 |      |         |
| Faith groups (please specify)                                            |                                 |      |         |

As above generally. In addition, there may be potential adverse impact of vetting process on Muslims, in view of counter terrorism measures in 2005. This is outside MPA control, and monitoring will be in place to indicate if the vetting process is operating adversely.

MPA might consider the need for scrutiny or monitoring of the operation of the MPS Vetting process, as part of the monitoring of equalities in general, to establish if there is any evidence of negative impact.
8. Please give a brief description of how this policy benefits the equality target groups identified in the above table, i.e. promotes equality?

All current and potential employees of the MPA and all contractors are subject to exactly the same standards of vetting and vetting processes.

9. If there is a negative impact on any equality target group, is the impact intended or legal?

The Comments above refer to the potential negative impact of vetting. The impact is legal in so far as it arises out of the operation of national security measures authorised by government and applied to all police services equally.

If the negative impact is not intended, discriminatory and/or high in impact, complete part 1 and move on to the full assessment.

10. What actions could be taken to amend the policy/strategy/project to minimise the low negative impact?

The policy incorporates monitoring and local appeal mechanisms to minimise the risk of negative impact as a result of any actions or omissions by the MPA itself.

11. If there is no evidence that the policy/strategy/project promotes equality, equal opportunities or improves relations within equality target groups, what amendments could be made to achieve this?

There is no scope for the MPA to amend the fundamental provisions relating to vetting, as these are the result of national policy.

12. How will the policy, strategy or project be implemented including any necessary training?

The policy has been in operation in practice since February 2005. The practices relating to vetting have been in operation since the MPA came into existence; the policy statement codifies practice. Once the policy statement is formally signed off, all line managers and TU reps will be briefed, and the policy will be available on the intranet.

Full Assessment necessary: ☑ No

Date completed: 5 September 2005

Signed by Line Manager: D. Riddle

Signed by Race & Diversity Unit: D. Lewins

Approved by SMT: C. Crawford
Please return a hard copy and electronic copy to the Race & Diversity Unit once completed. The original signed hard copy & an electronic copy should be kept within your unit for audit purposes.