

EQUALITY IMPACT ASSESSMENT WORKBOOK



Department:	HR
Corporate Document(s) this Equality Impact Assessment Relates to:	Maternity, Adoption and Support Leave Joint Policy
Associated Documents:	

Equality Impact Assessment	
Developed By	Rebecca Newman
Part One Initial Assessment Approved By	Abraham Eshetu
Part Two Full Assessment Approved By	N/A
Date Published:	5 th June 2014
Review Date:	5 th June 2016
Version Control:	Version 1

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
<p>Main aim To provide information to staff and officers on their entitlements and rights in relation to maternity, adoption and support leave and pay, in line with employment legislation, Police Regulations, Home Office guidance and PSC guidance.</p> <p>To outline the procedure from start to finish, outlining the responsibilities of the individual, line manager and HR function.</p> <p>Benefits</p> <ul style="list-style-type: none"> • Detailed procedures to follow and clear way to determine the entitlements of the individual • Outlines the responsibilities of HR and line management during the process and where to find more information if required. • Support networks highlighted. <p>Outcomes</p> <ul style="list-style-type: none"> • A robust well publicised system to provide accurate information to all individuals and management involved in maternity, adoption and support processes • Ability to track the progress of the maternity/adoption/support leave at all times • Maternity/adoption/support procedures meet legislative requirements 	20/11/13

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	
<ul style="list-style-type: none"> • Police Officers • Police Staff • Line Management • Police Federation • Superintendent's Association • UNISON • HR Specialists • Payroll • Support Network Groups 	20/11/13

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

External	
None	20/11/13

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.

The following are responsible for notifying line management by legislative deadlines, and providing appropriate documentation as required:

- Individuals who are pregnant
- Individuals who are matched with a child for adoption
- Individuals whose partner is pregnant/is the biological father of a baby due to be born for whom they will have responsibility
- Individuals whose partner has been matched with a child for adoption

The joint HR Department is responsible for ensuring that the legislative requirements and Force policy are met for each of the above, providing information and written confirmation of entitlements and monitoring the process.

Line management are responsible for providing information to the individual, supporting them prior to leave, agreeing levels of contact during leave and undertaking risk assessments for pregnant individuals and new mothers.

HR Policy & Reward are responsible for updating the policy as required as a result of legislative changes both nationally and within the Home Office framework.

Payroll are responsible for ensuring that the individuals receive the appropriate pay on instruction from line management/HR.

1.4 What factors could contribute or detract from the outcomes?

Entitlements are clearly outlined to avoid confusion – the details are extremely complex and provided in the main by statute, leaving no room for deviation from the procedures.

Line managers need to be aware of their responsibilities throughout the process and ensure these are implemented.

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

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		x		20/11/13
Disability		x		20/11/13
Gender reassignment		x		20/11/13
Marriage and civil partnership		x		20/11/13
Pregnancy and maternity		x		20/11/13
Race		x		20/11/13
Religion or belief		x		20/11/13
Sex		x		20/11/13
Sexual orientation		x		20/11/13
Family Status e.g. dependants or caring responsibilities		x		20/11/13
Economic Status		x		20/11/13

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.

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

	Yes	No	Reason	Date
Is there potential for adverse impact?		X		20/11/13
Can this adverse impact 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 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.	X
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.

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

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: Rebecca Newman
Position: HR Policy & Reward Manager
Date: 20th November 2013

Name: Abraham Eshetu
Position: Diversity Manager
Date: 13th March 2014

Name: Charlie Hall
Position: DCC
Date: 30th April 2014

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	

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

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?	
---	--

Protective Security Marking:	NOT PROTECTIVELY MARKED
------------------------------	-------------------------

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?	
--	--

2.4 Monitoring

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

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.	
---	--

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 IAG	<p>Do Norfolk Constabulary have any access to Suffolk Association of Women Policing on any level? If not, are there any plans for a similar support system for Norfolk's staff?</p> <p>As an aside to the above, I was also of the understanding that Norfolk had their own Women Policing Network but this doesn't appear to be mentioned in the policy at all.</p>	<p>No access to Norfolk Constabulary staff and officers. No current arrangements for a similar system in Norfolk however the Norfolk Flexible Workers, Gender and Carers group are new in forming and would like to consider this possibility.</p> <p>SAWP is mentioned specifically due to its provision of the buddy scheme, but policy has been amended to include reference to the Norfolk group.</p>
	<p>I wondered if there was a support group within the organisation for Fathers. There is much emphasis put on the emotional and physical maternal needs. Apart from paternity leave, there is no support for fathers.</p> <p>This may be beyond remit of this policy, but might be considered elsewhere. Fathers often find problems & conflict with their expected duty to support the expectant mother, or the process for assisted conception with little or no acknowledgment of impact on them. Particularly with the demands of the policing role.....the impact on an individual could have high organisational cost too.</p> <p>Likewise with adoption (including within same sex relationships) and early birth, complications and death of either child or mother.... Support (even a peer support group) including contact with children through divorce/relationship breakdown could be an extension of this.</p> <p>If there are no plans/ resources for such a support group, within the constabulary,</p>	<p>To my knowledge no such support group exists or is planned.</p> <p>Individuals can seek support from line management, or in cases where health is affected, via Occupational Health. Occ Health would also be able to provide information on organisations which may be able to assist.</p> <p>No amendment required to policy.</p>

	<p>maybe a database of resources and organisations could be compiled and made available.</p> <p>All the recent data on sickness absence have shown that domestic reasons (child related being primary reason) are an increasing cause of significant short term (i.e. under 7 days) absence and rising in past 2 years, so this could be pro-active & have positive cost saving result in addition to staff support.</p>	
Ipswich & Suffolk Council for Racial Equality (ISCRE)	<p>At some point the differences between maternity pay and paternity pay/ leave may be challenged. There is an interesting article explaining it: http://www.employmentlawwatch.com/2011/04/articles/employment-uk/enhanced-paternity-pay/ The general view is for employers to “wait and see”.</p>	<p>Both officers and staff receive enhanced paternity pay for the first week of ordinary paternity leave. The policy will be amended as required in line with relevant legislation/case law.</p>
	<p>You might want to revisit the principle of some parts of occupation maternity pay being repayable if no return to work, whilst occupational paternity pay is not. It probably is not unlawful discrimination, as we move towards shared leave, this should be reconsidered.</p>	<p>The details of police staff occupational maternity pay are laid down in the PSC Handbook and are therefore a national arrangement. No amendment to policy required.</p>
	<p>I note the policy does not cover support for women expressing milk at work. Does any other policy cover this?</p>	<p>At 10.5 on page 16, the policy states: “Facilities for breastfeeding women should be provided to allow the individual to express and safely store expressed milk, refer to the Facilities Department for full details.” No amendment to policy required.</p>
	<p>Section A, para 3.4: The HSE website contains guidance for employers and employees on health and safety during pregnancy at www.hse.gov.uk/mothers It lists the following risks that employers should look out for: Physical agents Movements and postures Manual handling</p>	<p>The list within the policy states that it is not exhaustive. Full details are given on the risk assessment document which is available separately. No amendment to policy required.</p>

	<p>Shocks and vibrations Noise Radiation (ionising and nonionising) Compressed air and diving Underground mining work Biological agents Infectious diseases Chemical agents Toxic chemicals Mercury Antimitotic (cytotoxic) drugs Pesticides Carbon monoxide Lead Working conditions Facilities (including rest rooms) Mental and physical fatigue, working hours Stress (including post-natal depression) Passive smoking Temperature Working with visual display units (VDUs) Working alone Working at height Travelling Violence Personal protective equipment Nutrition</p> <p>Clearly your list is less comprehensive. Consideration could be given to expanding your list to give additional guidance.</p>	
	<p>Para 4. & Section C: The policy will need to be reviewed in 2015 as fathers and partners will be entitled to unpaid time off to attend two antenatal appointments.</p>	<p>The policy will be updated in line with relevant legislation/case law as required. No amendment to policy required.</p>
	<p>Paragraph 5.8: This is now Employment Support Allowance</p>	<p>Policy amended as requested</p>
	<p>Paragraph 9.15: I do not think the highlighted section is sufficiently clear (for example in the case of a women having several children are you suggesting only 52 weeks is reckonable?) The adoption equivalent is better worded, as at Section B, paragraph 7.13.</p>	<p>The wording for maternity and adoption is different as police officers can take more than 52 weeks' maternity leave if they commence it early enough, whereas adoption leave is capped at 52 weeks in total. There is, however, a</p>

		<p>cap on 52 weeks' reckonable service for officers in line with Home Office guidelines, and this is per period of maternity leave (the return to duty referred to here is where there is a return to duty during their maternity leave and the officer then recommences maternity leave – it does not relate to subsequent births). No amendment to policy required.</p>
	<p>Paragraph 5.8 (Maternity) and 3.6 (Adoption): I am surprised that the rule regarding occupation pay repayment if no return to work in maternity is not mirrored in adoption. Have I got that wrong? As mentioned before the whole issue of repayment of occupational maternity pay should be reviewed.</p>	<p>Repayment of occupational maternity pay is only a condition for police staff, it is not a condition for police officers. Unlike officers, police staff do not receive any occupational adoption pay, so there is no rule to be mirrored. Police officers and staff currently have very different pay and leave conditions in relation to maternity and adoption. No amendment to policy required.</p>
Norfolk GPA	<p>Section A, Paragraph 8.1: referring to Stillbirth or the death of a baby after birth for a mother the paragraph completes as..." the woman can request special leave or take sick leave".</p> <p>This appears to be quite abrupt and unsympathetic to the loss of a child, whereas on page 30 para 2.3 it is written for Stillbirth or death of a baby after birth for a Partner that "managers are strongly encouraged to adopt a sympathetic approach to such requests" when referring to applications for special leave. Thus the two paragraphs seem somewhat disparate with each other.</p> <p>My suggestion would simply be to include</p>	<p>Policy amended as requested.</p>

	<p>“Managers are strongly encouraged to adopt a sympathetic approach to such requests.” into point 8.1 at the end of the paragraph for mothers.</p>	
Norfolk Unison	<p>Para 9.9: The line manager will, during a pregnancy one to one explain that the staff member could potentially be called to court and direct them to this policy document;</p>	Policy amended as requested.
	<p>Para 9.10: Once a line manager becomes aware that a staff member is required to attend court, they must liaise with Witness Care to confirm this is a definitive requirement by CPS before contacting the staff member to advise;</p>	Policy amended as requested.
	<p>Para 9.11: Where practicable Witness Care will, in conjunction with CJS, endeavour to arrange a set date/time for attendance at court in order to assist with childcare arrangements and minimise impact during maternity leave;</p>	Policy amended as requested.
	<p>Para 9.12: Once attendance is confirmed Norfolk Constabulary will undertake a risk assessment, both staff members and police officers are expected to attend court during maternity leave unless they have a doctors certificate confirming they are unfit;</p>	Policy amended as requested.
	<p>Para 9.13: Attendance at court as a police witness is classed as ‘duty’ and should be booked as such, payment for court is calculated on a daily rate for police officers and on a KIT day rate for the hours in attendance only for police staff, ie you have been at court in total for 4 hours so can claim 4 hours pay as part of a KIT day, the period of maternity leave is not affected.</p>	Policy amended as requested.
Joint Performance & Analysis Department	<p>Para 1.2: Norfolk has established the ‘Norfolk Flexible Workers, Gender and Carer’ group. It would be useful if details regarding this group could also be included in the Maternity information pack and details added to the policy.</p>	Policy amended as requested.
	<p>Para 2.4: It would be helpful for the policy to state that where, how and at what time this MSM takes place should fit with the needs of the individual on maternity leave</p>	Policy amended as requested, although timing, date and location must also be suitable for line manager.
	<p>Para 4.2: Could examples be provided of what is meant by ‘evidence of appointments’</p>	Policy amended as requested
	<p>Throughout the policy, a number of</p>	Police officers and police

	considerable differences exist between what Police Officers are eligible for in comparison to Police Staff. For example, section 5 states Maternity leave for police officers is a maximum of 15 months and they are eligible for full pay for the first 18 weeks of maternity leave. In contrast, police staff are only eligible for a maximum of 52 weeks leave and get no period of full pay. Section 5.6 also states that police officers can give considerably less notice regarding a new return work date than police staff. It is not clear on why these differences exist and at face value, seem unfair. This should either be looked into or made clear within the policy as to why the differences exist.	staff currently have very different terms and conditions, including within the maternity/adoption subject area. Police officers are servants of the crown and are governed by police regulations in this area, whereas staff are governed by employment law and the terms and conditions within the nationally negotiated Police Staff Council Handbook, as well as local contractual arrangements. No amendment to policy required.
Suffolk Office of the PCC	Paragraph 1.3: I suggest that reference is made to the need for policies and procedures to comply with the Human Rights Act/Conventions.	All HR policies state: "Norfolk and Suffolk Constabularies are committed to ensuring this policy complies with relevant legislation". No amendment to policy required.
Norfolk CPA	All responded with no comments.	No action required.
Norfolk Supt Association		
Suffolk Reach Out		
Suffolk Diversity Unit		
Suffolk Police Fed		