

<b>EQUALITY IMPACT ANALYSIS IRT, NPT, INVESTIGATION and CUSTODY</b>	
<b>1</b> Name of Review	<p>This is the equality impact analysis for the <b>SHIFT REVIEW</b> for the pillars of IRT/INVESTIGATION/NPT/CUSTODY.</p> <p>A Working Group have consulted with staff in these pillars of policing and gathered data in a number of ways.</p> <p>Their intention was to establish which staff members (with protected characteristics) may be adversely affected by the shift changes.</p> <p>The Working Group have also shown that due regard has been, and will be taken in respect of all equality issues regardless of whether there is a protected characteristic.</p>
<b>2</b> Date	<p>The date this version was circulated is the 14/06/11. However, it should be recognised this is a Live document and it will be constantly updated and reviewed. Current outstanding actions are in red in the body of the document.</p>
<b>3</b> Name of person completing the EIA	<p>The Working Group responsible for the process of compiling this EIA were the lead reviewer of the shift review team, a member of the Police Federation equality team, the HR Manager - Equalities, the Assistant Branch Secretary of UNISON and a member of the Diversity &amp; Cohesion Unit.</p> <p>All of these working group members have read the responses to the consultation and have agreed the figures and the content of this EIA.</p> <p>A HR lead was identified in respect of implementation of the shift changes.</p>
<b>4</b> What areas and/or functions are covered within this review?	<p>The Full Shift Review for IRT, NPT, Investigation and Custody Functions are covered in this EIA.</p> <p>A working group was formed, they agreed what the consultation process would be to gather information for this EIA and complete the analysis.</p> <p>There were several elements to the methodology.</p> <p>A/ It was agreed that a force email would be sent out explaining what the EIA was, and that all staff with protected characteristics could submit an anonymous form saying how they may be affected by a change in their shift pattern via the front page of the intranet.</p> <p>B/Data was also gathered from Occupational Health with regards disability.</p> <p>C/ recent Grievances were also considered.</p> <p>D/The Forum were consulted</p> <p>E/The Advisory Groups were also consulted (after being given the figures with regards the Staff Consultation replies).</p> <p>This information was then assessed by the working group.</p>

**SUMMARY**

There is a total of 1463 staff working in these 4 policing pillars. These include Police Officers and Police staff.

These can be broken down as follows;

IRT 503  
Investigation 408  
NPT 448  
Custody 104

With regards the anonymous survey (as at A/ above), there were 104 replies to the intranet consultation process; this is just over 7% of the total staff who could have replied.

This EIA breaks down the figure of 104, so as to better explain the findings.

40 replies were deemed to be from people who stated they would be adversely affected; however from the wording of the reply the working group determined that these staff did not have protected characteristics.

The adverse effects detailed by these 40 people included adverse financial implications from a shift change, more journeys to work or a work/life balance deterioration.

There were 13 people (out of the 104 who replied), who actually thought the change was positive and liked the proposed shift change.

The other 51 replies raised issues that were potentially equality issues.

Further Analysis of this figure by the Working Group found that only 5 of the 51 were people who would be adversely affected and had a protected characteristic.

In effect, there are only 5 people out of a potential workforce of 1463 who disclosed that they would be adversely affected and have a protected characteristic.

However it is important and necessary that due regard is being given to not only these 5 staff, but also to the other 47 replies as well.

The Organisation has Practice Directions that facilitate due regard to all our staff. This primarily revolves around flexible working applications. HR will ensure these are being applied fairly.

These 47 replies can be broken down still further under 3 headings. These are all replies where the person submitting them stated they would be adversely affected with the change in shift.

34 of these were Carers, 11 said their marriage would suffer and 2 stated that because of their age they could not work the proposed

	<p>shift. (A few staff were affected in more than one area).</p> <p><b><u>Carers</u></b> There were 34 replies from people who stated that they had caring responsibilities, (31 for children, 2 for the elderly and 1 for a disabled person).</p> <p>The working group felt that being a carer, is not in itself a protected characteristic however gender is.</p> <p>It is also known that nationally most carers are female. The working group can confirm that due regard has been and will be taken for carers in allowing flexible working applications. There is no gender issue as everyone can apply for flexible working regardless of their gender.</p> <p><b><u>Marriage</u></b> There were 11 people who stated they would be adversely affected because they were married. The reason given was generally that they would spend less time with their spouse and their relationship in some instances may be affected as a result.</p> <p>It is clear the shift changes affect everybody, and not just married staff. The working group have concluded that married people are not being discriminated against. Again, this does not fall under the parameter of being a protected characteristic, and due regard is being taken, as the Organisation will consider flexible working applications from all, regardless of marital status.</p> <p><b><u>Age</u></b> There were 2 staff members who stated that the shift change would be difficult for them because of their age (they were both in the age range 36 to 54). Again it was felt this was not a protected characteristic scenario, as staff were not being treated any differently because of their age. Likewise, all staff, regardless of age, can apply for flexible working.</p> <p><b><u>Grievances</u></b> There are no grievances registered as a result of the shift review, and this will continue to be monitored by HR.</p> <p><b><u>The Forum.</u></b> The details of the Shift Review were circulated to The Forum membership and no issues have been raised. Issues can be raised through the Forum at any point.</p> <p><b><u>Public</u></b> The only direct information gathered from the public will be through the Advisory Groups (Community Cohesion Unit will update the working group when feedback is received from the groups.</p> <p>Both A and B Divisions have replied and have stated they will not be taking this to the A and B Division Advisory groups as they do not believe the risk warrants this.</p> <p>Whilst the internal issues are much greater than external, the Public are still a key stakeholder in this, and whilst the next</p>
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	<p>comments are not yet evidence based, it is deemed that the public will be in favour of the review as there will be more availability of officers to the public at peak demand times than there currently is. Consequently Public Satisfaction and confidence should improve.</p> <p>The Shift Review Team discovered that some teams were having as many as 153 Rest Days per year , plus Annual Leave and Public Holidays, and it is felt that should the public have been made aware of that fact , it would not have had a positive effect on public confidence.</p> <p>It is felt that confidence and satisfaction will increase once the Public realise they will get “More for the Same”, i.e. they will get a better service for no extra cost to themselves.</p> <p><b>Conclusion</b> The Working Group feel that there were only 5 replies in total where the respondee had a protected characteristic and will be adversely affected (shown in the table below). We can conclude that the risk of implementing this policy is minimal. In addition to the 5 staff members highlighted above, due regard is being shown to all staff, in all areas, and applications for flexible working will be fair, and will respect equality.</p> <p>The adverse impact on the 5 staff identified can be catered for by flexible working, reasonable adjustments and redeployment as appropriate. HR will be working with Occupational Health in respect of this.</p> <p>The HR Equality lead will continue to review and monitor this EIA at regular periods, (and in effect it will be considered constantly).</p> <p>HR Equality holds the RAW DATA figures of our workforce profile which does not raise any issues beyond those that have been raised.</p> <p>HR Equality also holds the “actual replies“ from the survey. These have been deemed to have confidential status as they may in some instances lead to identification of individuals. Consequently they are not attached to this public document.</p> <p>The working group have found that the changes in policy should be implemented as there are “No Showstoppers” and there will be minimal adverse impact.</p>	
5 Stakeholders	<b>The Public, All Staff, Staff Associations and Unions.</b>	
6 Are there concerns that the recommendations/ options from the review could have a differential impact on racial groups?	<b>No</b>	<p>There were no concerns expressed from any of the consultation processes with regards Racial groups. Prior to the consultation there was however, an expectation from the working group that there would be representations in respect of this.</p> <p>Issues can still be raised from The Forum and by other means.</p>
7 Are there any	<b>Yes</b>	<b>The expectation was that this may have a bigger impact</b>

<p>concerns that the recommendations/ options from the review could have a differential impact due to <b>gender</b>?</p>		<p><b>on women rather than men, due to maternity leave and the fact that women are generally a higher proportion of carers for children, the elderly and the disabled. Hence the working party expected there may be gender issues. This is supported by National statistics.</b></p> <p><b>However from the consultation process, gender was not raised as an individual issue outside of caring responsibilities.</b></p> <p><b>Caring responsibility was however highlighted as an issue, with 34 respondees out of a total of 104, stating that their caring responsibilities would be impacted upon negatively by the shift change.</b></p> <p><b>There is 1453 staff working in these 4 pillars.</b></p> <p><b>The caring issues are primarily child care and to a much lesser extent caring for the elderly (2 replies) and disabled (1 reply). There may be a risk of indirect sexual discrimination against women as a result of this. Flexible working requests will be considered regardless of gender. Therefore the working group feel there will not be a disproportionate adverse impact on either gender.</b></p> <p><b>Human Resources staff can also assist in the movement of impacted workers to a role where they can be better accommodated if they have needs to care for others.</b></p> <p><b>There was a concern that a change in shifts would reduce the number of Rest Days and weekends off for a large number of staff, and that this may lead to an increase in the number of flexible working applications from carers.</b></p> <p><b>We are planning to manage that; a Senior HR manager will be playing a part in that.</b>  <b>It is believed that this will give support, advice and guidance to managers who will be making decisions locally. This will help standardise processes and flexible working requests, so they remain fair and promote equality throughout the shift change process.</b></p> <p><b>Issues can always still be raised from The Forum and by other means.</b></p>
<p><b>8</b> Are there any concerns that the recommendations/ options from the review could have a differential impact due to <b>disability</b>?</p>	<p><b>No</b></p>	<p><b>There were 5 replies received which highlighted that the change in shift would affect individuals with a disability. These are likely to be cases which are being managed already if they are declared. There may need to be further extended management of these cases to make reasonable adjustments with the new shift patterns.</b></p>

		<p>If this process and the change in shifts results in an increase in disability disclosures, HR will refer these staff to Occupational Health for support.</p> <p>There are currently a number of people who are disabled and currently receive support. Any new disclosures will receive the same support. After liaising with the Disability lead, it is apparent that this EIA consultation process has resulted in some individuals declaring disability issues already, and as a result, support and guidance has been given in line with current Practice Directions.</p> <p>Work is ongoing by HR Equality to identify which staff members are on restrictions due to a disability, and confirms that redeployment is a reasonable adjustment if necessary where there is a disability.</p> <p>HR Equality will be proactive in seeking people with disabilities to offer support.</p> <p>A HR senior manager is responsible for staff with restricted duties. HR Equality will make the Senior Manager responsible for staff working with restricted duties) aware that shift patterns are changing and they will consider any reasonable adjustments that may need to be made.</p> <p>There are currently 26 staff on restricted duties across the Force; again these are relatively low numbers.</p> <p>There are some disabilities that will be affected by the Shift Review, but some will not be affected. Reasonable adjustments will be made for those who are affected.</p> <p>A Senior HR manager is in charge of Occupational Health and oversees staff on recuperative duties. Whilst recuperative duties should not extend beyond 6 weeks, HR Equality will make Occ Health aware so due regard can be taken for these staff as well when the shift changes are introduced.</p> <p>HR Equality is also responsible for the HANDS project (Humbersonside Action Network for Disability Support), and this is encouraging people with disabilities to come forward and identify to the Organisation any Disability they may have.</p> <p>It is felt by the working group that there is under disclosure in respect of disability and there is a fear factor in why staff do not disclose.</p> <p>Issues can still be raised from The Forum and by other means.</p>
9 Are there any	No	There were no concerns expressed nor is anything

<p>concerns that the recommendations/ options from the review could have a differential impact due to <b>sexual orientation</b>?</p>		<p><b>expected in respect of sexual orientation.</b></p> <p><b>Issues can still be raised by The Forum and by other means.</b></p>
<p><b>10</b> Are there any concerns that the recommendations/ options from the review could have a differential impact due to <b>age</b>?</p>	<p><b>No</b></p>	<p><b>There were 2 replies that suggested that the change in shifts would impact on individuals due to age. These were both related to the fact that because of their age both individuals felt they could not cope with the shift patterns that were being introduced. They were both in the 36 to 54 age range.</b></p> <p><b>These numbers are extremely low and hence there is a minimal impact. These staff members can also make flexible working applications.</b></p> <p><b>Issues can still be raised by The Forum and by other means.</b></p>
<p><b>11</b> Are there any concerns that the recommendations/ options from the review could have a differential impact due to <b>religious beliefs</b>?</p>	<p><b>No</b></p>	<p><b>There were no concerns expressed nor is anything expected in respect of religious beliefs.</b></p> <p><b>Issues can still be raised by The Forum and by other means.</b></p>
<p><b>12</b> Are there any concerns that the recommendations/ options from the review could have a differential impact due to <b>transgender</b>?</p>	<p><b>No</b></p>	<p><b>There were no concerns expressed nor is anything expected in respect of transgender.</b></p> <p><b>Issues can still be raised by The Forum and by other means.</b></p>
<p><b>13</b> Could the differential impact identified in <b>6 -12</b> amount to there being the potential for adverse impact on this review?</p>	<p><b>No</b></p>	<p><b>It appears that the adverse impact will be minimal.</b></p> <p><b>This EIA is, however, a live document and the working group will monitor this in the short and medium term.</b></p> <p><b>The HR Equality lead will continue to review and monitor this EIA at regular periods in the future and in the longer term, (so in effect it will be monitored indefinitely).</b></p> <p><b>This EIA will also take due regard from other reviews as other EIAs may well be relevant to this one.</b></p> <p><b>The equality lead is responsible for administering all EIAs and can raise any such issues.</b></p> <p><b>Issues can still be raised by The Forum and by other</b></p>

		means.
14 Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason?	N/A	There are very low numbers of staff who will be adversely affected. Consequently there is no significant adverse impact on any groups. All the issues can be locally managed.
15 Are there any minor alterations to the review wording, process or timescales that have been made as a result of this initial impact assessment? If so, please list them here.	YES	<p>HR representatives will be made aware of this EIA when considering Flexible working Applications and Managing Disability.</p> <p>The Equality Impact Analysis is ongoing and it will remain a live document and the review of any relevant data will be ongoing.</p> <p>The terms of reference for the Shift Review do not need to be changed as a result of this analysis.</p> <p>All flexible working plans currently in place will be reviewed as a result of the change in shifts.</p>
16 Should the policy proceed to a full Equality Impact assessment?	YES/NO.	<p>This is a reasonably comprehensive Equality Impact Analysis which has progressed well beyond the initial screening.</p> <p>Whilst an EIA is no longer a legal requirement the working group chose to complete this to show that Due Regard has, and is being taken by Humberside Police.</p> <p><u>Circulation</u> The Equality HR lead will retain the copies of this and all Equality Impact Analysis reports.</p> <p>The Equality HR lead will publish this on the HR equality and diversity website.</p> <p>The lead reviewer or their rep. will publish this on the CSR 2015 website.</p> <p>The Review lead has a copy to attach to the final paper in respect of the Review.</p> <p>A copy will be forwarded to the HR lead in respect of this.</p> <p>A paper will be prepared for The Equality Action Groups next meeting and this will be raised on the agenda by the HR Equality lead.</p> <p>A copy will be sent to ACO (HR), the HR lead for the Force.</p> <p>A copy will be sent to Occ Health.</p>

NOT PROTECTIVELY MARKED

Signed: (Assessor)
Date: 14/06/11

Written By	Date	Version
Lead Reviewer Rep.	06/01/11	1
HR Equality lead	07/01/11	2
Lead Reviewer Rep.	10/06/11	3

		All Responses	
Pillar	Staff Numbers		Disability
<b>NPT</b>	448	19	1
<b>IRT</b>	503	30	0
<b>INV</b>	408	31	2
<b>CUST</b>	104	24	2
<b>Totals</b>	1453	104	5

This table shows the policing pillar in the first grey column.

It then shows the number of staff currently in that pillar who were given the opportunity to respond to the EIA consultation in the second white column.

The third orange column shows how many responded to the consultation.

The fourth column, in yellow shows how many people responded whom it was deemed would be adversely affected and whom the working group felt had a protected characteristic.