



POLICE AND CRIME COMMISSIONER

EQUALITY IMPACT ASSESSMENT POLICY

Chief Executive

05/12/2024

CONTENTS

Purpose of policy: This policy sets out when EIAs are required, who is responsible for undertaking an EIA, and how they will be undertaken at the OPCCN.

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Applies to: All OPCCN policies, functions, activities or decisions

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1. Introduction

1.1. Reason for this policy

1.1.1. The Office of the Police and Crime Commissioner for Norfolk (OPCCN) must comply with the Public Sector Equality Duty, in accordance with the Equality Act 2010. The Public Sector Equality Duty sets out that local authorities must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

1.1.2. These are sometimes referred to as the three aims or arms of the general equality duty. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

1.1.3. The duties are to be applied to the nine protected characteristics, which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

1.1.4. To ensure that the OPCCN applies this duty it will undertake Equality Impact Assessments (EIAs) to determine if policies, functions, activities or decisions have a positive or negative impact on nine protected characteristics. It also provides a template to respond to any negative impacts identified.

1.1.5. This policy sets out when EIAs are required, who is responsible for undertaking an EIA, and how they will be undertaken at the OPCCN.

1.2. Benefits of the policy

- 1.2.1. EIAs allow for reflection on the policy creation process, which can identify efficiencies and identify problems within the policy more generally.
 - 1.2.2. In relation to equalities, an EIA ensures protected characteristic groups are considered in the policy creation process.
 - 1.2.3. Implementing this policy ensures that the OPCCN complies with the Equality Act 2010.
- 1.3. Development of the policy
- 1.3.1. This policy has been developed by the Policy, Research and Equalities Officer and has been informed by several examples of best practice in EIAs. It has been informed by the Senior Management Team at the OPCCN.

2. Policy Statement

- 2.1. All OPCCN staff leading the development of policies, functions, activities or decisions are required to undertake an EIA on said policies, functions, activities or decisions whenever there will be an impact on members of the public or internal colleagues. This should be undertaken as soon after the initiation of this work as possible. The staff member leading on the decision is the Responsible Officer, and all EIAs must be signed off by an OPCCN Director.
- 2.2. Initiating the EIA process:
 - 2.2.1. The EIA process should begin as soon after the initiation of a policy, function, activity or decision as possible.
 - 2.2.2. For policies, functions, activities or decisions that do require a decision notice, EIAs form part of the checklist which must be completed before a decision notice can be signed off. However, the Responsible Officer should begin the EIA process at the same time they begin to develop a policy, function, activity or decision.
 - 2.2.3. For policies, functions, activities or decisions that do not require a decision notice EIAs are a requirement. The Responsible Officer is accountable for completing the EIA process. The Chief Executive Officer will not sign off any policies, functions, activities or decisions without evidence of the EIA process being followed.
- 2.3. How to complete an EIA:
 - 2.3.1. EIAs should be completed by the Responsible Officer.
 - 2.3.2. Completing an EIA requires knowledge of the policy, function, activity or decision and reflection on the potential impacts for protected characteristic groups. Guidance notes on how to complete the document can be found in the template folder and support can also be provided by the Policy, Research and Equalities Officer.
 - 2.3.3. Based on the information collected, the Responsible Officer needs to identify if the policy, function, activity or decision will impact negatively on any protected characteristic group.
 - 2.3.4. If a negative impact has been identified, then the Responsible Officer must determine how these impacts will be responded by putting actions in place. The EIA allows for three broad risk levels once these actions are taken into account:
 - Low risk: the actions that were identified and completed solve all or almost all of the issues or potential issues. Any remaining issues are justified and explained. The policy may be an example of best practice, and can continue.

- Medium risk: the actions that were identified and completed solve some of the issues or potential issues, but some remain. The remaining issues are justified and explained. The policy can continue.
- High risk: most of the issues identified have not been solved. This outcome means significantly more work needs to be done to change the policy, or alternatively the policy should be stopped.

2.3.5. For low risk and medium risk outcomes, the next step is to achieve director level sign off. Sign off should be gained from the director responsible for the policy, function, activity or decision.

2.4. Responsible Officer

2.4.1. The Responsible Officer is the OPCCN staff member responsible for the development of the policy, function, activity or decision. The Responsible Officer is accountable for completing an EIA and ensuring it is signed off correctly.

2.5. Signing off EIAs

2.5.1. As highlighted, EIAs are a requirement of a decision notice. For a decision notice to be completed the related EIA must have been signed off at director level. The Chief Executive Officer must also be satisfied with the EIA relating to the decision notice in order to sign off the decision notice.

2.5.2. For policies, functions, activities or decisions that do not require a decision notice, approval is required from the Chief Executive Officer. The Chief Executive Officer must be satisfied the EIA process has been followed in the development of the policy, function, activity or decision.

2.6. Publication

2.6.1. The OPCCN does not typically publish EIAs as they may contain sensitive information such as victim support service data. However, if a specific request is made then an edited version can be made available to the public, along with an explanation of what has been removed and why.

2.7. Equalities Officer

2.7.1. The Policy, Research and Equalities Officer is able to provide support to those responsible for completing an EIA, though ultimate responsibility for undertaking an EIA remains with the Responsible Officer. The Policy, Research and Equalities Officer

is able to provide support in accessing protected characteristic groups, equality legislation and EIA guidance.

2.8. Government Security Classification

2.8.1. Incomplete EIAs should be marked as OFFICIAL until complete, unless the policies, functions, activities or decisions they relate to are sensitive. If the content is sensitive then incomplete EIAs must be marked as OFFICIAL – SENSITIVE.

2.8.2. For more information Government Security Classification please visit:
<https://www.gov.uk/government/publications/government-security-classifications>

3. Appendix 1 – Full EIA

Equality Impact Assessment (EIA)

Please use the accompanying EIA Guidance Notes when completing this document.

1. Who is completing the EIA, and when? (Lead and support(s))

Lead and job title:

Support(s) and job title(s):

Date EIA began:

Date EIA completed:

2. What is the name of the policy and what is its purpose or description?

Name:

Purpose or description:

3. Will the impact of this policy be internal (on OPCC and/or Constabulary colleagues), external (on the public), or both? (Please tick ✓)

Internal	
External	
Both	

4. Use the tables below to summarise the key information, actions and risk rating of the policy. Please add new rows to the table as needed in each section.

Remember the three parts of the PSED:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by, or under, this Act;
- Advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it;
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

AGE

▪ What data or information have you looked at? ▪ Who have you consulted and what did they tell you? Please provide a summary of the relevant findings or key points, including sources.	▪ What <u>actions</u> have you taken (or will you take) in response to your findings? ▪ What issues or potential issues (if any) are you <u>unable</u> to solve and why? Once actions are complete, please update with any relevant details.	Who owns these actions, and what date were they completed or are they due to be completed by?	Taking the information and actions into account, is the risk high, medium, or low? * <i>see guidance doc p.3-4 for further information</i>

DISABILITY

▪ What data or information have you looked at? ▪ Who have you consulted and what did they tell you? Please provide a summary of the relevant findings or key points, including sources.	▪ What <u>actions</u> have you taken (or will you take) in response to your findings? ▪ What issues or potential issues (if any) are you <u>unable</u> to solve and why? Once actions are complete, please update with any relevant details.	Who owns these actions, and what date were they completed or are they due to be completed by?	Taking the information and actions into account, is the risk high, medium, or low? * <i>see guidance doc p.3-4 for further information</i>

GENDER REASSIGNMENT

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

MARRIAGE AND CIVIL PARTNERSHIP

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

PREGNANCY AND MATERNITY

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

RACE / ETHNICITY/ NATIONALITY/ LANGUAGE

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

RELIGION OR BELIEF

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

SEX

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

SEXUAL ORIENTATION

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

INTERSECTIONALITY AND ANY OTHER FACTORS (rural or urban location; socioeconomic factors etc.)

<ul style="list-style-type: none"> What data or information have you looked at? Who have you consulted and what did they tell you? <p>Please provide a summary of the relevant findings or key points, including sources.</p>	<ul style="list-style-type: none"> What <u>actions</u> have you taken (or will you take) in response to your findings? What issues or potential issues (if any) are you <u>unable</u> to solve and why? <p>Once actions are complete, please update with any relevant details.</p>	<p>Who owns these actions, and what date were they completed or are they due to be completed by?</p>	<p>Taking the information and actions into account, is the risk high, medium, or low?*</p> <p><i>see guidance doc p.3-4 for further information</i></p>

5. Will the impact of the policy be measured? If yes, when and how will this be done? If no, why not? (e.g. evaluations, surveys, research, data analysis on service users and/or outcomes etc.)

<p>Yes – it will be monitored by... or No – it will not be monitored because... (please delete as appropriate)</p>	
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6. Having considered all the information above, what is the overall equality risk rating of this policy?

High/ medium/ low *(please delete as appropriate)*

Why did you choose this rating? *(Please see pages 3-4 of the guidance document for risk rating definitions.)*

Director level sign off

Name:

Signature:

Date:

4. Appendix 2 – Procedure

How to complete an EIA – practical steps

- An EIA is required for every policy or significant decision which might have an equality, diversity and inclusion impact.
- The EIA template and guidance notes can be found in the Equality Impact Assessment folder.
- Before starting to fill the template in, please use 'save as' to create a new document version and put it in the 'EIAs in progress' folder. It is vital that you do this step, otherwise you will be overwriting the template file which will prevent others from using the original template and may result in data loss.
- When naming your file, follow the usual OPCCN file naming conventions and put 'EIA' within the title.
- Complete the EIA using the guidance notes and with assistance from relevant colleagues, including the Equalities Officer if you have any questions.
- Once the EIA is completed and has been signed off by an OPCCN Director, move the Word document to the 'EIAs completed' folder and save a copy as a PDF to sit alongside the Word document in the same folder.
- Top tip: It is recommended that you 'Pin to Quick access' the folder path for the EIA template and folders for ease of use – this can be done by right clicking on the folder when you are in File Explorer and clicking 'Pin to Quick access' on the menu that appears; it will then appear on the left-hand-side of your folder directory in File Explorer.