

Dumfries and Galloway Constabulary



Established 1948

DIVERSITY IMPACT ASSESSMENT

GUIDANCE DOCUMENT & TOOLKIT

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1. INTRODUCTION

Why conduct an Impact Assessment?

The force, as do all other public sector authorities, have a legal obligation under the Race Relations (Amendment) Act 2000, Disability Discrimination Act 2005 and the Equality Act 2006 to conduct impact assessments on their standard operating procedures (SOPs), policies, force standing orders and functions involving:

- (i) assessing and consulting on the likely impact of its proposed SOPs, policies, force standing orders and functions on the promotion of race, gender and disability equality;*
- (ii) monitoring its SOPs, policies, force standing orders and functions for any adverse impact on the promotion of race, gender and disability equality;*
- (iii) publishing the result of consultation and monitoring of such assessments.*

The impact assessment should be completed in line with the General Duties in respect of race, disability and gender (Appendix A).

In line with the Association of Chief Police Officers in Scotland (ACPOS) Diversity Strategy, the aim of Dumfries and Galloway Constabulary is to provide a quality of service that is fair, accessible and meets the needs of all.

Dumfries and Galloway Constabulary's SOPs, policies, force standing orders and functions will therefore be monitored and assessed for the potential of an adverse affect on the grounds of colour, race, gender, transgender status, relationship status, nationality, ethnic or national origins, disability, age, sexual orientation, religion or belief.

Terminology

For the purpose of this document the terms:

SOP - will be used as a generic term to describe a current, proposed or amendment to a Standard Operating Procedure, policy, force standing order or function;

Diversity Areas - race, gender, transgender status, marital or civil partnership status, nationality, ethnic or national origins, disability, age, sexual orientation, religion or belief' will be referred to as the diversity areas;

Functions - refers to the force's powers, duties and responsibilities; and

'policies' means the formal and informal processes and procedures for making decisions in carrying out the work of Dumfries and Galloway Constabulary.

It is intended to achieve this by:

- ensuring our SOPs are inclusive and non-discriminatory;
- providing equal opportunities in employment and development so that our workforce reflects the diverse communities we serve; and
- working in partnership with individuals, groups and agencies to ensure that we remain responsive to the changing needs of society.

We aim to achieve this long-term vision by continuing to build on the progress made following the implementation of:

- the Race Equality Scheme first published in November 2002;
- the Disability Equality Scheme published in December 2006;
- and the Gender Equality Scheme published in June 2007

and by continuing to apply the principles of:

- the Race Relations (Amendment) Act 2000;
- the Disability Discrimination Act 2005; and
- the Equality Act 2006

to all aspects of diversity.

This does not relate purely to the SOP but also to any accompanying aide-memoirs, forms, leaflets, posters etc.

What is an impact assessment?

An impact assessment is a way of assessing, and consulting on, the effects that a SOP is likely to have on a minority group or an individual from a minority group. It includes looking for opportunities for any positive impact that may have been missed or that could be better exploited, as well as the detection of actual or potential negative impact on people.

The main purpose of an impact assessment is to pre-empt the possibility that the SOP could affect a minority group(s), or an individual from a minority group, unfavourably. The assessment extends to monitoring the actual effects of the SOP, once it is put into practice and being alert to any concerns about the way it is (or is not) working.

There are two stages to an impact assessment:

- the screening stage and
- the assessment stage.

The screening stage requires a nominated Reviewing Officer to analyse a SOP and grade it (high, medium, low or no relevance) in relation to any potential adverse impact that it may have on a minority group or an individual from a minority group.

All SOPs identified as having a high or medium impact for its relevance to the general duties will be reviewed under the assessment process with the view of its potential impact being reduced where possible. Low graded SOPs or those deemed to have 'no relevance' will be monitored and assessed in due course.

When do you conduct an Impact Assessment?

The impact assessment process should begin as soon as a SOP is required to be implemented or when a current SOP requires to be amended/updated to confirm whether or not it is relevant to equality duties.

It will only be confirmed that a SOP is relevant to the equality duties once it has been screened. All SOPs therefore need to be screened for their relevance to the duty.

2. THE FORCE'S CURRENT POSITION

During the development of the updated Race Equality Scheme, which was published in November 2005, force SOPs were screened against their relevance to the race equality duty which at the time fitted the required criteria from the Commission for Racial Equality.

The Equality and Human Rights Commission (EHRC – the amalgamation of the Commission for Racial Equality, the Disability Rights Commission and the Equal Opportunities Commission) have streamlined their expectations of public authorities, therefore these documents require to be looked at again against all diversity areas.

Identified members of staff have been trained in carrying out impact assessments.

Having been trained to conduct an impact assessment, they were tasked to complete the impact assessment of their nominated document with the support of the Diversity Officer.

Clearly the force has responsibility for a range of documents/functions and it is not possible to conduct impact assessments in relation to all of these immediately. Therefore there is not a projected timescale for the completion of the impact assessment of all force SOPs, however this will be an ongoing process that will be integrated into the force SOP development process.

3. IMPACT ASSESSMENT PROCESS

This toolkit has been developed by the force's Diversity Unit to assist staff with the completion of an impact assessment.

The impact assessment process is detailed in the attached flowcharts (Appendix D) and takes the following format.

Impact Assessment - Screening Stage

The screening of a SOP must follow the screening template (Appendix E). Completion must take no longer than a maximum of four weeks, from the date of issue.

Reviewing Officer's Role

- A Reviewing Officer is nominated by the owner of the SOP that is to be screened. The Reviewing Officer will be responsible for screening a SOP.

The Reviewing Officer should be someone with a full knowledge and understanding of the SOP being assessed. The Diversity Officer must be updated with the name and location of the member of staff who will undertake the screening.

- Using Appendix E the Reviewing Officer screens the SOP for a 'high, medium, low or no relevance' grading, against the screening toolkit within four weeks. The SOP is screened by using readily available information eg performance indicators, census details, media reports and data from previous monitoring.

Based on the evidence and completion of the screening form the Reviewing Officer is responsible for grading the SOP high, medium, low or no relevance, relevant to equality duty on the grounds of the diversity areas.

To assist the Reviewing Officer to grade the SOP a background/briefing document (Appendix B) has been produced outlining some of the issues that require to be considered during the screening process.

- If a SOP is identified as having a low impact or no relevance on a minority group, or individual from a minority group, Appendix F will be completed by the Reviewing Officer and a full impact assessment completed at a later date. This approach will prevent over consultation on community groups and will channel their resources to the high and medium impact SOPs.
- If there is evidence from the screening stage that highlights that there may be a potential for the SOP to have a high or medium impact on a minority group, or individual from a minority group, the SOP requires to be assessed, using Appendix G.
- On completion of the screening stage the Reviewing Officer is required to propose consultation methods that should be considered during the assessment process.
- The completed screening form and evidence gathered during the screening stage must be sent to the Diversity Officer prior to the commencement of the assessment stage.

Timescale for Completion

If the four week deadline is not met discussion will take place between the Diversity Officer and Reviewing Officer and, with the agreement of the Diversity Officer, a maximum two week extension period granted to complete the screening stage.

Dumfries and Galloway Constabulary has legal obligations regarding the completion of impact assessments of force SOPs and staff that fail to adhere to this process, without reasonable explanation, may be subject to disciplinary matters.

Diversity Officer's Role

- On receipt of the completed screening form, including evidence gathered and consultation recommendations from the Reviewing Officer, the Diversity Officer will sample a percentage of the completed forms to ensure that they have been screened to a consistent standard.
- At the discretion of the Diversity Officer the original screening grade may be altered. Reasons as to why the alterations have been made must be documented on the screening form.
- The Diversity Officer will endorse the impact assessment form with their recommendations with regards to consultation and return the enquiry to the Reviewing Officer for the assessment stage to be completed.

Grading a SOP

To establish whether or not a SOP requires to be scrutinised by the completion of the assessment stage of the impact assessment it must first be graded.

In order to grade a SOP it requires to be screened by use of the screening template (Appendix E).

The purpose of the screening stage is to establish if there is the potential for the SOP having a HIGH, MEDIUM, LOW IMPACT or have NO RELEVANCE, on any group or individual on the grounds of any of the diversity areas.

For a SOP to be graded the following questions require to be considered against the screening form:-

- Is there any evidence that any part of the proposed SOP could discriminate unlawfully, directly or indirectly against any group or individual on the grounds of any of the diversity areas?
- Is the proposed SOP likely to affect relations between certain groups or individual on the grounds of any of the diversity areas?
- Is the proposed SOP likely to damage relations between any particular group(s) and Dumfries and Galloway Constabulary?
- Could the proposed SOP in their current form be applied in an unfair or discriminatory way?

Having answered the above questions you should then consider the scale of the impact and the potential of actual occurrence in this force.

Impact Assessment - Assessment Stage

The assessment of a SOP must follow the assessment template (Appendix G). During completion of the assessment the Reviewing Officer is responsible for all consultation exercises and must retain all evidence gathered whilst completing the process.

Reviewing Officer's Role

- Reviewing Officer conducts consultation and gathers evidence relating to the impact assessment.
- Based on the evidence obtained they must evaluate the SOP to establish whether or not it has the potential to directly or indirectly discriminate against a minority group, or individual from a minority group, and make appropriate adjustments where necessary.

Should any significant adjustments be made as a result of the consultation exercise the SOP should be re-assessed to ensure that it does not have a negative impact on another community.

If the Reviewing Officer considers that no adjustments can be made they must quantify and justify their reasons on the assessment form.

- The completed impact assessment is returned to the Diversity Officer accompanied by all evidence gathered during the assessment stage.

Diversity Officer's Role

- If Diversity Officer is satisfied with the contents of the assessment and the SOP the documentation relating to the impact assessment will be retained by them and the SOP returned to the Reviewing Officer for it to be progressed as per the current force processes.
- If Diversity Officer is not satisfied with the completed assessment it will be returned to the Reviewing Officer with recommendations for additional enquiry.

If an assessment is returned to the Reviewing Officer then they are required to carry out further enquiry and return documents to Diversity Officer.

- In exceptional circumstances where the impact assessment highlights that the SOP is directly discriminatory and it is felt by the Reviewing Officer that it cannot be amended to reduce the level of the potential impact legal advice would be sought.
- On completion of the screening and assessment template the Diversity Officer will provide the Reviewing Officer with a summary report form which requires to be completed and the results published, as per the guidance in Section 6.
- Consultative groups involved in the assessment stage will be updated regarding the decisions made as a result of the process.
- Diversity Officer will provide Reviewing Officer with a monitoring report form to be completed in respect of the impact of the implemented SOP.

4. CONSULTATION PROCESS

Consultation at varying levels should form an ongoing process throughout the screening and assessment stages, to search for views, ideas and feedback on a SOP.

Having completed the screening stage both the Reviewing Officer and Diversity Officer will make recommendations with regards to who should be consulted with during the assessment stage and in what format.

Consultation must involve liaising and communicating with people from any group on the grounds of the diversity areas.

However this does not mean that every community must be involved in all impact assessments. Who is consulted with depends greatly on the contents and who may potentially be affected by the SOP. Consultation with every group could become unnecessarily burdensome, time-consuming and disproportionate to what the assessment requires. For example where people representing a particular area have been involved in a very similar assessment elsewhere, and/or where issues relating to equality are well tested and documents and sufficient quantitative and qualitative data already exist to inform this may be used to provide an accurate assessment.

Where members of the public are involved in an impact assessment, it should be ensured that they receive adequate briefing and training on the SOP area.

To prevent over consultation, consultation must be proportional to the size and contents of the SOP.

The following methods of consultation should be considered:

- Internal Consultations – eg staff associations/networks
- External Consultations – eg Dumfries & Galloway Multicultural Association, Dumfries and Galloway Coalition of Disabled People

Consultation can be conducted in a variety of ways eg meetings, interview, surveys. All evidence gathered from the consultation must be documented on the assessment stage toolkit.

There is need to demonstrate that the force pro-actively drives forward consultation and show that there has been due regard given to equality enabling minority groups to be involved in the decision-making. Consideration must therefore be given to consulting with other groups if original consultation attempts are unsuccessful.

If consultation reveals an adverse effect on equality, the SOP will require to be re-examined and alternative ways of fulfilling the SOP's criteria considered.

Should it be considered that the consultation findings have been manipulated the force may fail to meet its legal responsibilities under the equality duties.

How Do We Consult?

There are a number of guiding principles that should be considered, but are not a definitive list:

- Identify and involve 'hard to reach' groups and individuals;
- Quality not numbers;
- Ensure it is appropriate;
- Consider providing support eg interpreters;
- Are any of those you wish to consult with having a regular meeting that you can attend?;
- Use a location convenient or familiar to consultees;
- Be flexible and be aware of time constraints;
- All distributed documentation and location should be accessible;
- All the language used should be inclusive;
- Provide staff with guidance or training;
- Respect confidentiality;
- Consultation feedback is important;
- Don't assume, just ask.

Problems with Consultation

Every public authority has to consult eg NHS, Fire & Rescue Service, therefore voluntary organisations will be increasingly consulted. There is the potential for consultation fatigue. The Diversity Officer will provide advice and guidance in this area and will liaise with Dumfries and Galloway groups to minimise/avoid over consultation.

5. MONITORING SOPS

Monitoring is a continual process and involves examining the actual impact of the SOP. Once a SOP has been assessed it is monitored to ensure that it is not having an adverse impact on minority groups, or an individual from a minority group.

There may already be mechanisms in place for recording data for a specific SOP that following amendment may be broken down by for example ethnic group or gender.

Having fully assessed the impact of a SOP the Reviewing Officer should consider the key points that require to be monitored to ensure that it is not having an adverse impact.

Other areas may require more extensive work.

The information gathered is the evidence of the force's progress in meeting its general duties in respect of race, disability and gender and that SOPs implemented are delivering a greater equality.

Monitoring should be detailed enough to assist with future impact assessments but also reality based on the resources available.

If during the monitoring of a SOP it is found that there is a detrimental effect on any group or an individual as a result of it being implemented the SOP will be reassessed and appropriate amendments made, unless the negative impact is a justifiable one.

6. PUBLISHING RESULTS OF AN IMPACT ASSESSMENT

What information needs to be published?

Dumfries and Galloway Constabulary are required to publish the findings and results of all impact assessments conducted on SOPs. The publication will include a summary of the following:

- Screening – outlining the research and data used to assess the impact of a SOP and a summary of the findings of the screening stage;
- Consultation – detailing who was consulted during the assessment stage, the findings from the consultation and how this information was used to develop the SOP;
- Impact Assessment – detailing whether the SOP has an adverse effect and if it has been changed or modified;
- Monitoring – How the SOP is to be monitored, how often and by whom;
- Results – Summary of the findings of the impact assessment stage;

There are exceptions to this rule relating to restricted SOPs.

Information will be published in line with the force Freedom of Information Publication Scheme.

How to complete an Impact Assessment Summary Report

The process for completing an Impact Assessment Summary Report outlined in Appendix I, takes the following format:

- An Impact Assessment Summary Report Form (Appendix I) will be completed by the Reviewing Officer on completion of a full Impact Assessment or screening stage in the case of a low graded SOP.
- An Impact Assessment Summary Report requires to be clear, concise and balanced. The quantity of information will be dependent on the size of the SOP. However the contents of the summary must be in proportion to the SOP's relevance to the three parts of it's legal obligations to General Duties in respect of race, disability and gender (Appendix A).

The following points should be considered and included in the Summary Report:

- How the consultation was carried out;
- A summary of consultation responses;
- Is there any evidence to show that any groups or an individual from a group have the potential for being discriminated against, if so which one(s)?
- Whether or not the SOP requires to be amended to prevent any group or individual being discriminated against;
- If the SOP adversely affects people from certain groups, can it be justified because of its overall objective? Note: Direct discrimination is not in law, capable of justification; only indirect discrimination can be objectively justified.
- How the SOP to be monitored, how often and by whom to ensure that it does not discriminate against any group or individual once implemented.

- Once a Summary Report has been completed the Reviewing Officer will forward the document to the Diversity Officer.

The Summary Report will be published under the force's Freedom of Information Publication Scheme on the force's website, www.dg.police.uk.

A copy of the Summary Report will also be circulated to the consultees involved in the Impact Assessment by the Diversity Officer.

7. Training Issues

Initially Diversity Trainers and staff from Sections who are identified as being responsible for a large number of force SOPs will be required to attend one day of training at Police Headquarters. The training will consist of theory and a tabletop exercise, screening and impact assessing a live SOP relevant to their Section, Department or Division.

This training will continually be evaluated to ensure that the best placed members of staff are trained in conducting impact assessments.



EQUALITY DUTIES

Race Equality Duty – November 2002

The general duty requires a public authority in all its functions to have due regard to:

- eliminating unlawful racial discrimination and harassment;
- promoting equality of opportunity; and
- promoting good relations between people of different racial backgrounds.

Specific duties:

To publish a Race Equality Scheme setting out how they intend to fulfil the duty's requirements, public authorities must:

- list the functions and SOPs which are relevant to the general duty on race [this list must be reviewed every three years];
- set out arrangements for assessing and consulting the likely impact of their proposed SOPs on race equality;
- set out arrangements for monitoring their SOPs for any adverse impact of race equality
- set out arrangements for publishing the results of any assessments, consultations and monitoring they carry out to see whether their SOPs have an adverse impact on race equality;
- set out arrangements to make sure that the public have access to the information and the services they provide;
- set out arrangements for training their staff on the new race general and specific duties.

Public authorities must monitor employment procedures and practices.

Disability Equality Duty – December 2006

The basic requirement for a public authority when carrying out their functions is to have due regard to do the following:

- promote equality of opportunity between disabled people and other people;
- eliminate discrimination that is unlawful under the Disability Discrimination Act;
- eliminate harassment of disabled people that is related to their disability;
- promote positive attitudes towards disabled people;
- encourage participation by disabled people in public life; and
- take steps to meet disabled peoples needs, even if this requires more favourable treatment.

‘Due regard’ means that authorities should give due weight to the need to promote disability equality in proportion to its relevance.

Specific duties:

- a public authority should publish a Disability Equality Scheme demonstrating how it intends to fulfil its general and specific duties
- a public authority should involve disabled people in the development of the Scheme;
- the scheme should include a statement of:
 - the way in which disabled people have been involved in the development of the scheme;
 - the authority’s methods for impact assessment
 - steps which the authority will take towards fulfilling its general duty [the action plan];
 - the authority’s arrangements for gathering information in relation to employment, and, where appropriate, its delivery of education and its functions
 - the authorities’ arrangements for putting the information gathered to use, in particular in reviewing the effectiveness of its action plan and in preparing subsequent disability equality schemes.
- a public authority must, within three years of the Scheme being published, take the steps set out in its action plan [unless it is unreasonable or impracticable for it to do so] and put into effect the arrangements for gathering and making use of information; and
- a public authority must publish a report containing a summary of the steps taken under the action plan, the results of its information gathering and the use to which it has put the information.

Gender Equality Duty – June 2007

The general duty requires a public authority in all its functions to have due regard to:

- eliminate unlawful discrimination;
- eliminate harassment; and
- promote equality of opportunity between men and women.

In addition to eliminating discrimination on the basis of gender, the General Duty also extends to eliminate unlawful discrimination and harassment in employment and vocational training for people who undergo, are undergoing or have undergone gender reassignment.

Specific duties:

A public authority must:

- To prepare, publish and implement a gender equality scheme, showing how we will meet our general and specific duties and setting out our gender equality objectives;
- To report against the scheme every year and review the scheme at least every three years;
- In formulating overall objectives, consider the need to include objectives to address the causes of any gender pay gap;
- Prepare and publish an equal pay statement;
- Review and report on the equal pay statement within three years;
- To gather and use information on how force SOPs and practices affect gender equality in the workforce and in the delivery of services;
- To consult stakeholders (ie employees, service users and others) and take account of relevant information in order to determine gender equality objectives;
- To assess the impact of current and proposed SOPs and practices on gender equality; and
- To implement the actions set out in the scheme within three years.

Since the force must meet all aspects of each of the general and specific duties we must ensure that we know how all our SOPs and functions affects race, gender and disability equality. For example, a new recruitment SOP may help to promote gender equality, but if it is badly introduced it may actually damage gender relations.

Enforcement

If a public authority does not meet these general duties, people with an interest in the matter, or the regulatory bodies ie the Commission for Racial Equality, the Equal Opportunities Commission and the Disability Rights Commission, can apply to the High Court for a judicial review. The regulatory bodies can also use their powers of formal investigation to enforce the general duty. These were the powers the CRE used to review the Police forces in England and Wales following on from “The Secret Policeman” television programme.

BRIEFING INFORMATION

For personal briefing purposes, consider the potential problems/impact on the SOP if the person involved:

1. Is unable to speak, read and/or write English
2. Has difficulty understanding or communicating due to a learning disability
3. Does not understand or is not familiar with the police role or service
4. Uses a wheelchair or has mobility problems
5. Is blind, deaf or has impaired vision, hearing
6. Has religious/traditional clothing requirements
7. Has specific prayer requirements
8. Has specific dietary requirements
9. Has to observe specific religious customs or traditions
10. Has specific requirements for medical treatment or in the event of death
11. Has specific customs in terms of male – female interaction/views on modesty
12. Is reluctant to communicate with police or has personal search issues due to sexuality
13. Does not have a permanent home address eg Gypsy Traveller
14. Is more at risk or vulnerable due to age related factors.

Likewise, certain SOPs/procedures may have to consider or make provisions for cultural/religious observances at sensitive locations, eg dog searches in religious buildings.

Religious Groups in Dumfries and Galloway:

Religion	Percentage of people stating religion	
	Dumfries and Galloway (Population 147,765)	Scotland (Population 5,062,011)
Church of Scotland	55.05%	42.40%
Roman Catholic	6.59%	15.88%
Other Christian	8.34%	6.81%
Buddhist	0.24%	0.13%
Hindu	0.02%	0.11%
Jewish	0.04%	0.13%
Muslim	0.14%	0.84%
Sikh	0.04%	0.13%
Another religion	0.37%	0.53%
None	24.65%	27.55%
Not answered	4.52%	5.49%

Ethnic Groups in Dumfries and Galloway:

Ethnic Group	Percentage of people in ethnic groups	
	Dumfries and Galloway (Population 147,765)	Scotland (Population 5,062,011)
White Scottish	83.35%	88.09%
Other White British	14.20%	7.38%
White Irish	0.76%	0.98%
Other White	1.04%	1.54%
Indian	0.08%	0.30%
Pakistani	0.08%	0.63%
Bangladeshi	0.01%	0.04%
Other South Asian	0.03%	0.12%
Chinese	0.17%	0.32%
Caribbean	0.02%	0.04%
African	0.04%	0.10%
Black Scottish or other Black	0.02%	0.02%
Any Mixed Background	0.15%	0.25%
Other ethnic group	0.06%	0.19%

Age Groups in Dumfries and Galloway:

Age Group	Percentage of people in age groups	
	Dumfries and Galloway (Population 147,765)	Scotland (Population 5,062,011)
Aged 0-19	23.17%	24.18%
Aged 20 – 34	15.70%	20.03%
Aged 35 – 49	21.51%	22.09%
Aged 50 – 64	20.44%	17.90%
Aged 65+	19.17%	15.90%

Examples of qualitative and quantitative data:

Performance Management:

- Racist incidents
- Homophobic incidents
- Performance Information Briefing Schedules [PIBS]
- Reports – IMAGE, SCOPE etc.
- Performance indicators
- Community Safety reports
- Significant custody episodes
- Complaints and compliments – general overview from CPSU

Diversity Intranet page:

- Minutes – ACPOS diversity business area/sub group meetings
- Minutes – other ACPOS groups
- Minutes – local diversity group meetings
- Diversity Awareness guide
- Census Statistics [available from Diversity Officer]

Minutes:

- Health and Safety minutes
- JBB minutes
- T&C meeting minutes

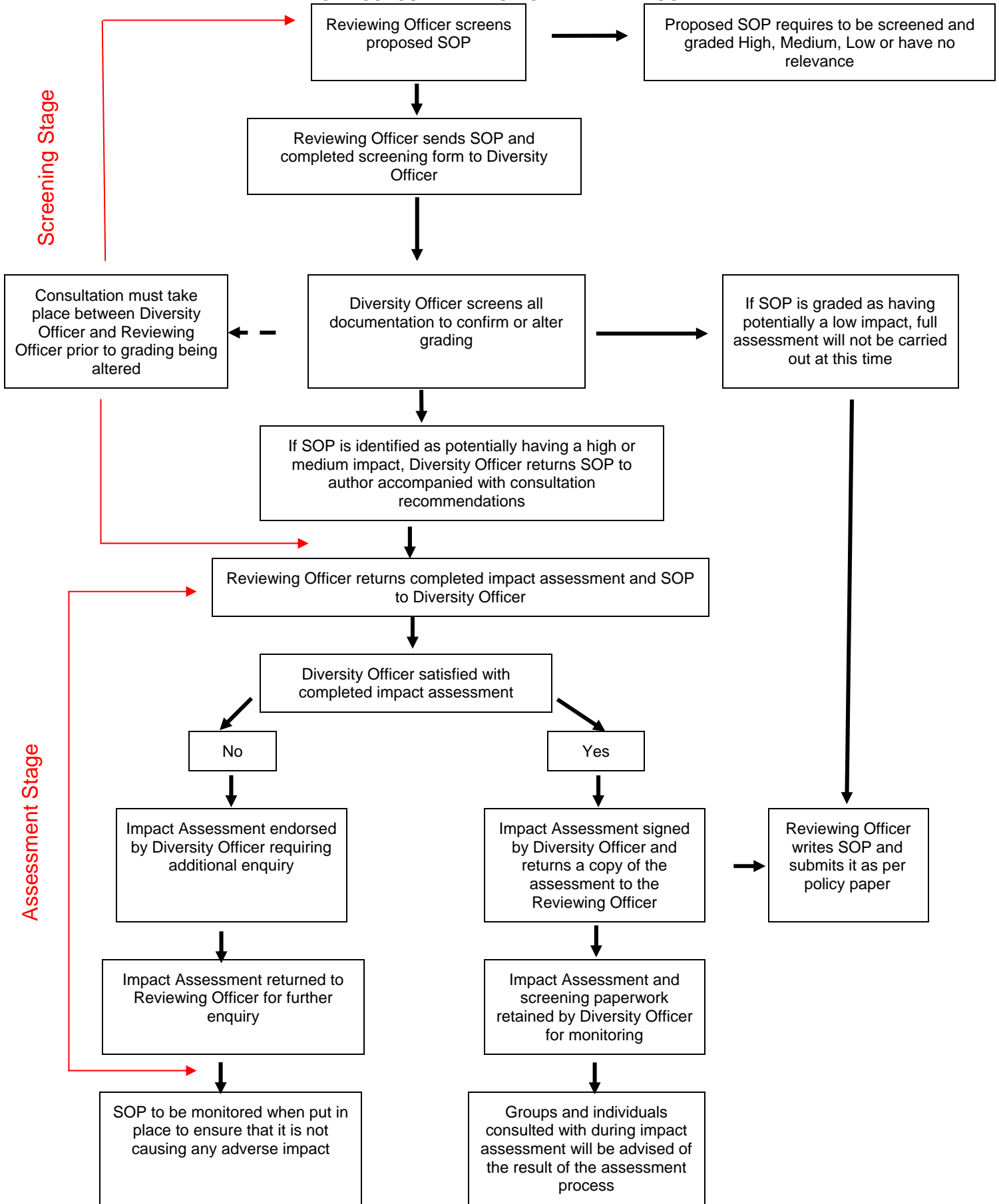
Environmental scanning:

- Codes of Practice
- HMIC reports
- Capita reports on compliance of buildings to DDA
- External research eg Capability Scotland report on hate crimes against disabled people
- Staff Association websites eg Unison, Federation, GPA, SEMPERscotland
- Internet

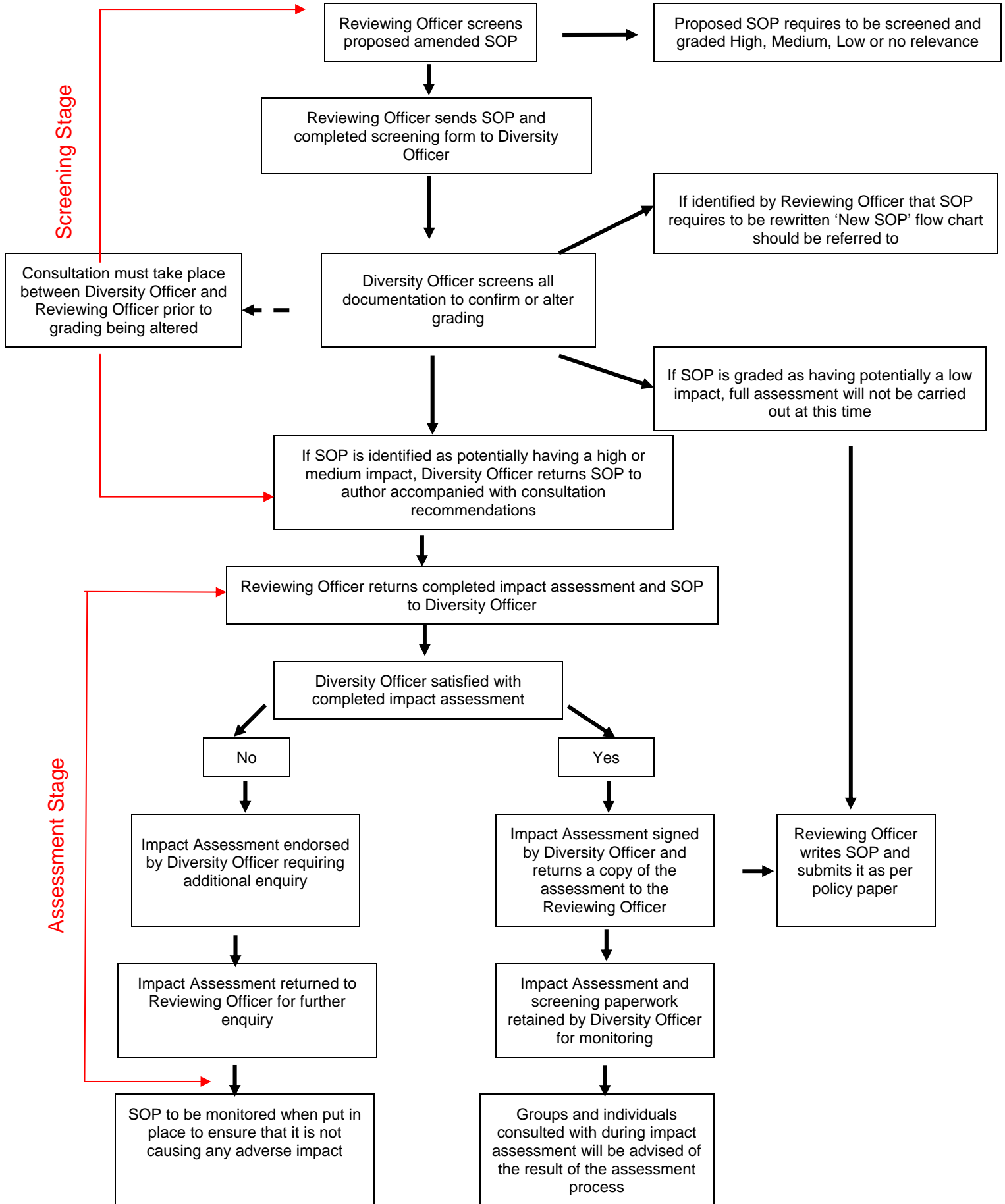
Other forces:

- FOI publication schemes
- Force SOPs

IMPACT ASSESSMENT FLOWCHART – NEW SOP



IMPACT ASSESSMENT FLOWCHART – SOP AMENDMENT



IMPACT ASSESSMENT - SCREENING STAGE

Diversity Ref No.		Date Allocated		Return Date	
Document Name:					
Document Type:	Standard Operating Procedure /Policy / Force Standing Order / Function				
Owner:					
Reviewing Officer:					

NOTE: When a SOP is referred to in this document it encompasses a proposed, current or amendment to a SOP/Policy or Function.

SECTION A – TO BE COMPLETED BY REVIEWING OFFICER

1. What is the purpose of the proposed SOP?

2. Who is intended to benefit from the SOP and how?

3. Is the SOP linked directly to any other of the force’s existing SOPs? If so which one(s)?

YES/NO, If yes please detail.

Note: Consideration should be given to all force SOPs which require to be consulted or cross referenced with during implementation of this SOP.

4. Is responsibility for the SOP shared with another department/organisation? If so, who has overall responsibility for conducting the impact assessment?

5. Detail the qualitative and quantitative evidence/data available and used in the completion of the screening stage.

Note: Reference should be made to the force’s Impact Assessment Guidance Document/Toolkit (Appendix F)

IS THE SOP RELEVANT TO THE GENERAL DUTY?

Eliminating unlawful discrimination and harassment

6. Is there any evidence that any part of the SOP could discriminate unlawfully, directly or indirectly against a group or individual from a particular group on any of the following grounds:

Why are they affected? What are the underlying reasons?

Note: Consideration should also be given to any omissions from the SOP that could lead to discriminating against a particular group(s).

Please circle YES/NO and give details

• Colour: Yes/No

<p>Colour – Issues to consider</p> <ul style="list-style-type: none"> - Would someone be treated differently because of the colour of their skin?

• Race: Yes/No

<p>Race – Issues to consider</p> <ul style="list-style-type: none"> - Name calling - Culture - Skin colour - Access to information – translation interpretation - Racial harassment and violence - Place of birth - Lack of awareness - Status within community - Language barriers

• Gender: Yes/No

<p>Gender – Issues to consider</p> <ul style="list-style-type: none"> - Stereotyping - Educational attainment - Exclusionary language and behaviour - Inclusion to diverse activities - Name calling - Caring responsibilities

• **Transgender status:** **Yes/No**

Transgender – Issues to consider

- Bullying / Harassment
- Right to Privacy - Intrusive questions / confidentiality of information
- Time off for medical treatment
- Support during transition stage
- Family / Relationships (same sex partners/parents)

• **Relationship status:** **Yes/No**

Relationship – Issues to consider

Would someone be treated differently because of their relationship status?

- married / divorced
- civil partnership / annulment of civil partnership
- single
- widowed

• **Nationality:** **Yes/No**

Nationality – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Ethnic or National Origins:** **Yes/No**

Ethnic or National Origins – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Disability:** **Yes/No**

Disability – Issues to consider

- Isolation
- Mobility issues
- Personal safety and security
- More than one disability (hidden / visible disabilities)
- Lack of awareness
- Access to information – alternative formats
- Name calling
- Educational attainment

• **Age:** **Yes/No**

Age – Issues to consider

- Bullying / Peer Pressure
- Access to specific activities
- Personal safety
- Language used which might be ageist
- Lack of awareness of age issues
- Awareness of personal development / relationships
- Caring for a sibling or a parent
- Isolation

• **Sexual Orientation:** **Yes/No**

Sexual Orientation – Issues to consider

- Bullying / hate crime
- Family / Relationships (same sex partners/parents)
- Intrusive questions / right to privacy / confidentiality of information
- Stereotyping
- Personal safety

• **Religion or Belief:** **Yes/No**

Religion and Belief – Issues to consider

- Values and belief
- Dietary requirements
- Gender differences within cultures
- Birth / bereavement arrangements
- Dress / jewellery
- Difference between religion and cultural requirements
- Worshiping

Note: Direct discrimination is unlawful and therefore cannot be justified. If the proposed SOP or amendments appear to directly discriminate an alternative must be considered for achieving the same result.

Promoting positive attitudes and good relations between people of different backgrounds

7. Is there evidence to show that the SOP is likely to have a positive or negative effect on relations between Dumfries & Galloway Constabulary and any of the following groups.

Note: Consideration should also be given to the possibility of the SOP having a positive or negative effect between the groups.

Please circle positive or negative and give details.

- **Colour:** **Positive/Negative/Neutral**

Colour – Issues to consider

- Would someone be treated differently because of the colour of their skin?

- **Race:** **Positive/Negative/Neutral**

Race – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

- **Gender:** **Positive/Negative/Neutral**

Gender – Issues to consider

- Stereotyping
- Educational attainment
- Exclusionary language and behaviour
- Inclusion to diverse activities
- Name calling
- Caring responsibilities

- **Transgender status:** **Positive/Negative/Neutral**

Transgender – Issues to consider

- Bullying / Harassment
- Right to Privacy - Intrusive questions / confidentiality of information
- Time off for medical treatment
- Support during transition stage
- Family / Relationships (same sex partners/parents)

- **Relationship status:** **Positive/Negative/Neutral**

Relationship – Issues to consider

Would someone be treated differently because of their relationship status?

- married / divorced
- civil partnership / annulment of civil partnership
- single
- widowed

• **Nationality:**

Positive/Negative/Neutral

Nationality – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Ethnic or National Origins:**

Positive/Negative/Neutral

Ethnic or National Origins – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Disability:**

Positive/Negative/Neutral

Disability – Issues to consider

- Isolation
- Mobility issues
- Personal safety and security
- More than one disability (hidden / visible disabilities)
- Lack of awareness
- Access to information – alternative formats
- Name calling
- Educational attainment

• **Age:** **Positive/Negative/Neutral**

Age – Issues to consider

- Bullying / Peer Pressure
- Access to specific activities
- Personal safety
- Language used which might be ageist
- Lack of awareness of age issues
- Awareness of personal development / relationships
- Caring for a sibling or a parent
- Isolation

• **Sexual Orientation:** **Positive/Negative/Neutral**

Sexual Orientation – Issues to consider

- Bullying / hate crime
- Family / Relationships (same sex partners/parents)
- Intrusive questions / right to privacy / confidentiality of information
- Stereotyping
- Personal safety

• **Religion or Belief:** **Positive/Negative/Neutral**

Religion and Belief – Issues to consider

- Values and belief
- Dietary requirements
- Gender differences within cultures
- Birth / bereavement arrangements
- Dress / jewellery
- Difference between religion and cultural requirements
- Worshiping

Promoting equality of opportunity

8. Could the SOP in its current form be applied in an unfair or discriminatory way?

YES/NO – Give details

• **Colour:** **Yes/No**

Colour – Issues to consider

- Would someone be treated differently because of the colour of their skin?

• **Race:** **Yes/No**

Race – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Gender:** **Yes/No**

Gender – Issues to consider

- Stereotyping
- Educational attainment
- Exclusionary language and behaviour
- Inclusion to diverse activities
- Name calling
- Caring responsibilities

• **Transgender status:** **Yes/No**

Transgender – Issues to consider

- Bullying / Harassment
- Right to Privacy - Intrusive questions / confidentiality of information
- Time off for medical treatment
- Support during transition stage
- Family / Relationships (same sex partners/parents)

• **Relationship status:** **Yes/No**

Relationship – Issues to consider

- Would someone be treated differently because of their relationship status?
- married / divorced
 - civil partnership / annulment of civil partnership
 - single
 - widowed

• **Nationality:** **Yes/No**

Nationality – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Ethnic or National Origins:** **Yes/No**

Ethnic or National Origins – Issues to consider

- Name calling
- Culture
- Skin colour
- Access to information – translation interpretation
- Racial harassment and violence
- Place of birth
- Lack of awareness
- Status within community
- Language barriers

• **Disability:** **Yes/No**

Disability – Issues to consider

- Isolation
- Mobility issues
- Personal safety and security
- More than one disability (hidden / visible disabilities)
- Lack of awareness
- Access to information – alternative formats
- Name calling
- Educational attainment

• **Age:** **Yes/No**

Age – Issues to consider

- Bullying / Peer Pressure
- Access to specific activities
- Personal safety
- Language used which might be ageist
- Lack of awareness of age issues
- Awareness of personal development / relationships
- Caring for a sibling or a parent
- Isolation

• **Sexual Orientation:** **Yes/No**

Sexual Orientation – Issues to consider

- Bullying / hate crime
- Family / Relationships (same sex partners/parents)
- Intrusive questions / right to privacy / confidentiality of information
- Stereotyping
- Personal safety

• **Religion or Belief:** **Yes/No**

Religion and Belief – Issues to consider

- Values and belief
- Dietary requirements
- Gender differences within cultures
- Birth / bereavement arrangements
- Dress / jewellery
- Difference between religion and cultural requirements
- Worshiping

RECOMMENDATION

9. Having completed the screening stage it has been identified that there are discriminatory issues relating to the following specific groups.

Colour	YES/NO
Race	YES/NO
Gender	YES/NO
Transgender	YES/NO
Marital/Civil Partnership Status	YES/NO
Nationality	YES/NO
Ethnic or National Origins	YES/NO
Disability	YES/NO
Age	YES/NO
Sexual Orientation	YES/NO
Religion or Belief	YES/NO

Potential level of adverse effect of a SOP to particular groups

10. Following evaluation of the evidence it has been identified that this SOP has the potential to cause the following levels of adverse effect

Colour	High	Medium	Low	No Relevance
Race	High	Medium	Low	No Relevance
Gender	High	Medium	Low	No Relevance
Transgender	High	Medium	Low	No Relevance
Marital/ Civil Partnership Status	High	Medium	Low	No Relevance
Nationality	High	Medium	Low	No Relevance
Ethnic or National Origins	High	Medium	Low	No Relevance
Disability	High	Medium	Low	No Relevance
Age	High	Medium	Low	No Relevance
Sexual Orientation	High	Medium	Low	No Relevance
Religion or Belief	High	Medium	Low	No Relevance

The following consultation is recommended:-

Signed: Date

Reviewing Officer

SECTION B – TO BE COMPLETED BY DOCUMENT OWNER

Contents of screening form has been noted and the following observations made:-

Signed Date

Document Owner

On completion please return this form and supporting evidence to Ruth Hawksworth, Diversity Officer, Police Headquarters, Cornwall Mount, Dumfries.

SECTION C – TO BE COMPLETED BY DIVERSITY OFFICER

Having reviewed the attached SOP and screening document I agree / disagree with the grading level allocated by the reviewing officer.

Please state comments if the grading level is disagreed with.

Following consultation with the Reviewing Officer the grading level has been altered to HIGH / MEDIUM / LOW or NO RELEVANCE to reflect the following points.

Signed:- Date
Diversity Officer

IMPACT ASSESSMENT

LOW IMPACT RATED DOCUMENT

Document Name:	
Document Type:	Standard Operating Procedures / Policy / Force Standing Order / Function
Owner:	
Reviewing Officer:	

This SOP has been screened against the impact assessment process.

Having evaluated the evidence gathered from the screening process this SOP is graded as a low impact SOP on a group or individual on the grounds of colour, race, gender, transgender status, relationship status, nationality, ethnic or national origins, disability, age, sexual orientation, religion or belief.

This SOP will be monitored for any adverse impact by the following means:
(State any data which is/will be routinely collected, how it is collected, who will be responsible for collecting the data and how often it will be reviewed).

Signed:- Date
Reviewing Officer

Noted:
Signed:- Date
Document Owner

Signed:- Date
Diversity Officer

IMPACT ASSESSMENT – ASSESSMENT STAGE

Throughout the impact assessment process the following should always be considered:

‘Does the proposed SOP or amendments show that it could have an adverse impact on some groups or an individual from a group on the grounds of colour, race, gender, transgender status, relationship status, nationality, ethnic or national origins, disability, age, sexual orientation, religion or belief?’

SECTION A – TO BE COMPLETED BY DIVERSITY OFFICER

CONSULTATION / RESEARCH RECOMMENDATIONS

Having evaluated the completed screening form it is recommended that the following sources be researched/consulted with regards to the proposed SOP or amendments:-

SECTION B – TO BE COMPLETED BY REVIEWING OFFICER

ASSESS LIKELY IMPACT

What are the main findings of your consultations / research? How reliable is this evidence?

If any of the recommended sources of consultation have not been consulted please state which and why?

Does the proposed SOP or amendments indirectly discriminate a group or individual on the grounds of any of diversity areas?

YES/NO

If so, who would it indirectly discriminate against and in what way?

If the proposed SOP or amendments affects people from certain groups, can it be justified because of its overall objectives?

Is there any reason to believe that people or an individual from any group on the grounds of any of the diversity areas could be affected differently or be disadvantaged in anyway by the proposal, eg in terms of access to a service, or the ability to take advantage of proposed opportunities?

YES/NO

If so, who would be disadvantaged and in what way?

Can the proposal be amended in anyway for this to be justified? Please give details.

If it cannot be justified what changes can be suggested to resolve the problem?

Could the proposed SOP or amendments unintentionally result in disadvantaging another group?

Are you confident that the proposed SOP or amendments is lawful and that you can justify it?

Is there any evidence to indicate that the proposed SOP or amendments will have a significant affect on staff or the public?

CONSIDER ALTERNATIVES

If there is the potential for the proposed SOP or amendments to have an adverse impact on any group or individual, how could it be modified to reduce or eliminate any identified negative impacts?

Could the proposed SOP or amendments lead to tensions between groups?

Could the proposed SOP or amendments damage relations between the force and a particular group? If so, which groups and how will relations be damaged?

What are the consequences for the Force, ie loss of credibility and confidence among some groups, if it is decided to make no changes to the proposed SOP or amendments?

Are there any aspects of the proposed SOP or amendments that could be arranged or could additional measures be taken to reduce or remove the adverse impact on a particular racial group without affecting the SOP's overall aims?

Do you need to take steps to counter any resentment that the proposed SOP or amendments might cause among other groups?

RECOMMENDATIONS

Have any amendments been made to the proposed SOP or amendments as a result of the consultation and research process?

If it is decided not to adopt the approach that is best for meeting the duty, what are the consequences for groups that might be adversely affected?

Will the social and economic costs or benefits to the group in question of implementing the option outweigh the costs to you or other groups?

Have you re-assessed the proposed SOP or amendments if you have made substantive changes to the original proposal?

Signed:- Date

Reviewing Officer

FORWARD FORM TO DOCUMENT OWNER FOR ENDORESMENT

SECTION C – TO BE COMPLETED BY DOCUMENT OWNER

Contents of assessment form has been noted and the following observations made:

Signed Date
Document Owner

On completion please return this form and supporting evidence to Ruth Hawksworth, Diversity Officer, Police Headquarters, Cornwall Mount, Dumfries, DG1 1PZ.

SECTION D – TO BE COMPLETED BY DIVERSITY OFFICER

Having reviewed the attached SOP and assessment document I agree / disagree with the contents of the SOP.

COMMENTS BY DIVERSITY OFFICER:-

ADDITIONAL ENQUIRY REQUIRED: YES/NO

If Yes, please specify

Signed:- Date
Diversity Officer

SECTION E - TO BE COMPLETED BY REVIEWING OFFICER

ADDITIONAL ENQUIRY

Please detail any additional enquiry carried

Please detail the outcome from additional enquiry

Signed:- Date
Reviewing Officer

Noted:
Signed:- Date
Document Owner

ENQUIRY COMPLETE

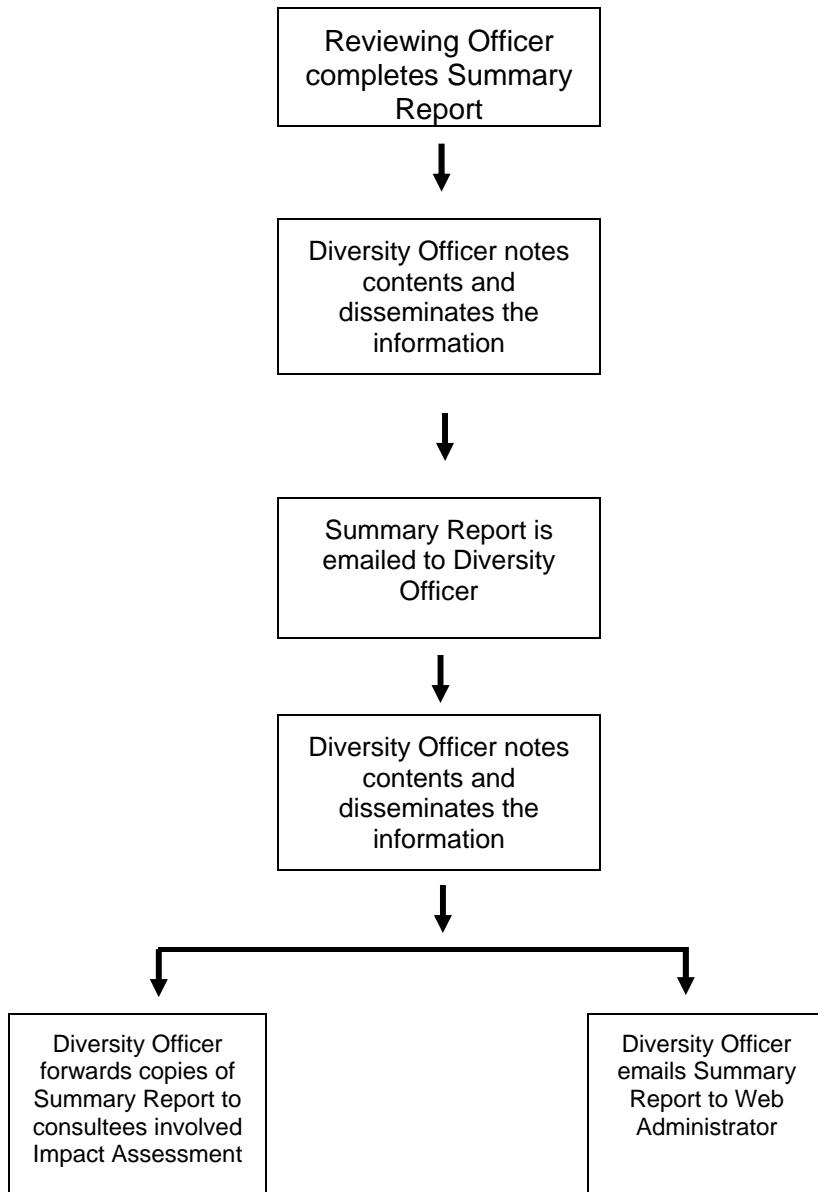
ADMINISTRATION

Signed:- Date
Diversity Officer

Evidence gathered and copy of screening and assessment form to be retained by Diversity Officer

Completed screening and assessment form returned to Reviewing Officer

FLOWCHART - COMPLETION OF A SUMMARY REPORT



IMPACT ASSESSMENT – SUMMARY REPORT

Document Name:	
Document Type:	Standard Operating Procedure / Policy / Force Standing Order / Function
Owner:	
Reviewing Officer:	

What is the purpose of the proposed SOP or amendments to current SOP?

Describe the aim of the proposed SOP or amendments to current SOP?

Who is intended to benefit from the proposed SOP or amendments and how?

Give a description of how proposed SOP or amendments was assessed against the potential of discriminating against a group or individual on the grounds of all diversity areas?

Consultation methods used and summary of findings

Conclusions reached from assessment and consultation

Amendments made to the proposed SOP or amendments following consultation. Please state why these changes were made.

How the SOP is to be monitored, how often and by whom

A review of the effects of the SOP is required to ensure that it does not discriminate against any group or individual on the grounds of all diversity areas.

Recommended Review Date:	
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This summary contains details of the Impact Assessment carried out relating to this SOP. Under Dumfries & Galloway Constabulary's Freedom of Information Publication Scheme a copy of the full report and consultation are available on request.

Copies can be reproduced in another format or language on request, please contact
Ruth Hawksworth
Diversity Officer
Dumfries and Galloway Constabulary
Police Headquarters
Cornwall Mount
DUMFRIES
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