



Equality Impact Assessment

Template for the Office of the Police and Crime
Commissioner for Norfolk

Directorate: Policy and Commissioning

Policy, strategy, review or function name: Policing Budget Consultation 2020-21

Completion date: 13/12/2019

Name of assessment / completer: Liam Bannon

Office of the Police and Crime Commissioner for Norfolk,
Building 8,
Jubilee House,
Wymondham,
Norfolk,
Nr18 0ww.

Equality Impact Assessments (EIA) – what you need to know

When do we need to undertake EIAs?

EIAs are needed when developing new, or considering changing current policies (this refers to functions, activities or the way we reach decisions). This will relate to most decision notices the Office of the Police and Crime Commissioner for Norfolk (OPCCN) makes. **The EIA procedure should be integrated with the policy creation process from the outset.** It may be the case that a full EIA is not needed. This should be determined by completing the [Initial EIA](#), which will determine the relevance of the policy to equality. The greater the relevance of a policy to equality, the greater the regard that should be paid to it.

What is an EIA?

An EIA is a tool that enables a local authority to assess the impact of a policy on different protected characteristic groups and develop steps that can be taken to promote equality where necessary. This tool ensures that the OPCCN pays due regard to the Public Sector Equality Duty by asking a series of questions that will help identify if a policy impacts on a protected characteristic group.

Who should undertake an EIA?

The officer responsible for the policy should undertake and own the EIA as they have an in-depth knowledge of the policy being created and have the ability to make changes to the policy where necessary. This does not mean that EIAs must be undertaken alone. In fact, a good EIA should be informed by subject matter experts and other key contributors in the policy creation process. The Equality Officer is also able to support those responsible for completing an EIA.

Why is it important?

Undertaking an EIA is not a legal requirement but complying with the Public Sector Equality Duty is, and completing an EIA is a good way to ensure compliance. It also ensures that policies are developed in an informed and effective way. As you will find when working through this document, it encourages thought on the policy landscape, evidence, consultation and, of course, equality. This method of reflecting on a policy when producing it can result in efficiencies being identified, it ensures that policy is evidence based and initiates taking steps to meet equality requirements.

What is the Public Sector Equality Duty?

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.

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.

The equality duty covers the nine protected characteristics:

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

How to undertake an EIA

The first step is to complete the [Initial EIA](#), to make sure that an EIA is needed. If you identify that a Full EIA is needed, you will need to consider the below information and complete the below assessment.

You will need to use your knowledge of the policy you are developing, the evidence surrounding the policy and to consider how this may impact, positively or negatively, on protected characteristic groups. You need to consider the following:

- Age equality – the effects on people because of their age, including young people and the elderly.
- Disability equality – the effects on all disabled people, including deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties and people with physical impairments.
- Gender identity – the effects on trans people.
- Marriage and civil partnership equality.
- Pregnancy and maternity equality – women who are pregnant or who have recently had a baby, including breast feeding mothers.
- Race equality – the effects on minority ethnic communities, including newer communities, Gypsy, Roma and Traveller communities.
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees.
- Sex equality – the effects on men, women, boys and girls.
- Sexual orientation equality – the effects on lesbians, gay men and bisexual people.

As previously mentioned, you don't need to undertake this assessment alone. You should work with other key stakeholders in the development of the policy and seek advice on equalities issues where appropriate. You need to identify how you will consult and who with. If you would like support with accessing specific communities then please contact the Equalities Officer. Undertaking consultation

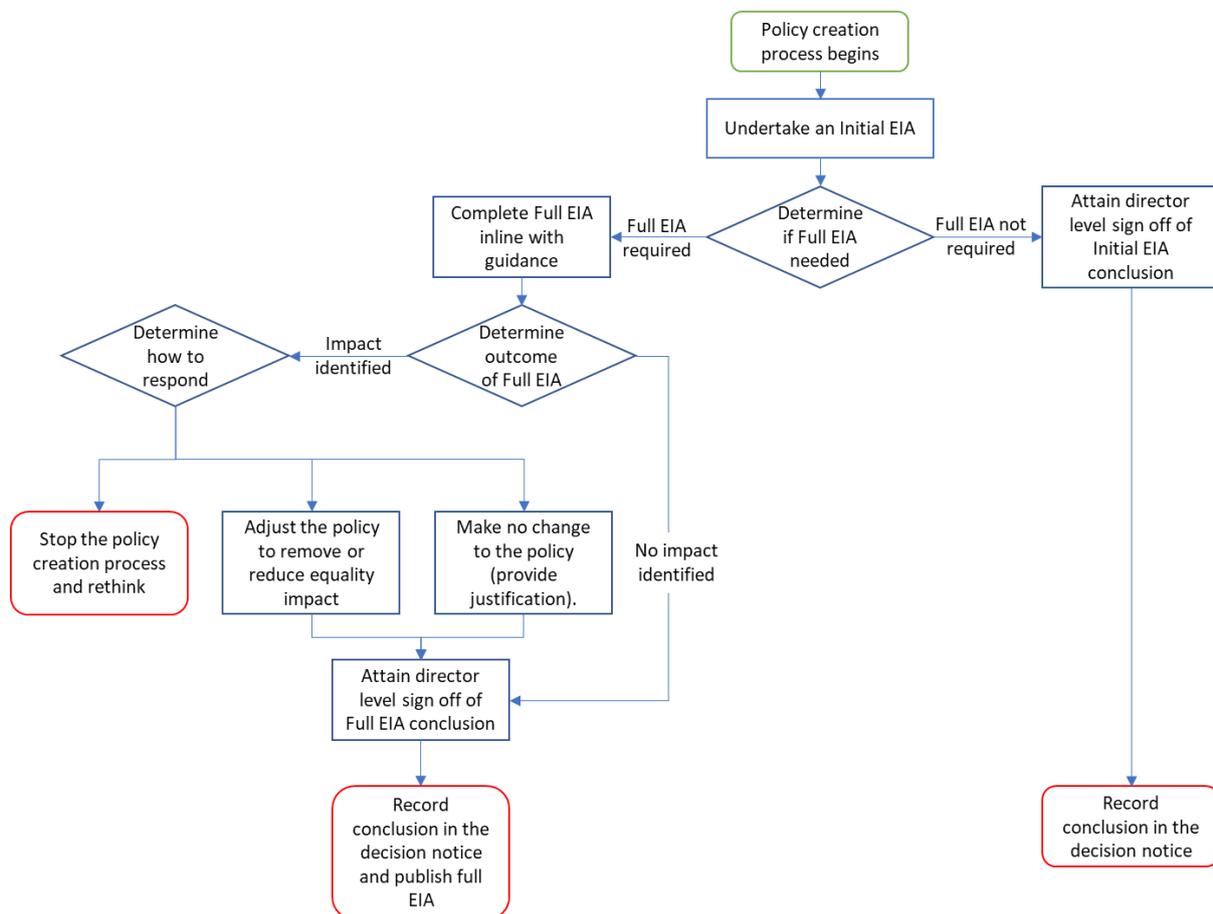
will help you to identify the impact of your policy, positive or negative. It should also be informed by any other relevant sources of information, such as surveys or similar EIAs.

If you have identified negative impacts on equality you will need to identify how you will respond, which in turn will determine the outcome of the EIA. In some cases, you will need to develop an action plan detailing how you will respond to the negative equality impact, who will own this response and how progress will be monitored.

What to do when you have completed the EIA

Ensure the assessment is considered when making decisions on your policy. Final decisions on how to proceed should be recorded in the assessment and you will need to record the outcome of the assessment in the decision notice relating to the policy. Sign off at director level is required to finalise Full EIAs and Initial EIAs that determine a Full EIA is not necessary. Once finalised Full EIAs should be published on the OPCCN’s website. As the completed form will be open access, you should ensure that it is jargon free.

Procedure



The Full Equality Impact Assessment (EIA)

The Assessor/s

	Name	Role
Lead	Liam Bannon	Policy and Research Officer, and Equalities lead
Support	Fay Crangle	Engagement Officer
Support	Gavin Thompson	Director of Policy and Commissioning
Support	Sarah Sutton	Communications Officer
Support	Suzanne Cranage	Communications Officer
Support	Dominic Chessum	Director of Communications

The Policy (this refers to functions, activities or the way we reach decisions)

Name of the policy: Policing Budget Consultation 2020-21

Description of the policy:

(Include the aims, objectives and purpose. Is there any relevant legislation? Does it relate to the Police and Crime Plan or Business Plan? This box is expandable.)

The Police and Crime Commissioner wants to engage with the people of Norfolk on the level of policing precept. The consultation asks for views on three scenarios based on local funding for Norfolk Constabulary which is contextualised and explained in the consultation document. The Office of the Police and Crime Commissioner (OPCCN) proposes consulting on the Commissioner's proposals and publishing the results. In undertaking this consultation, the OPCCN has developed the following principles of engagement:

- The OPCCN will provide the consultation information in other formats, if requests are received. This includes translated versions of the consultation.
- The OPCCN will provide support completing the consultation to people who need it.
- The consultation will collect information on several protected characteristics, including age, ethnicity, and gender identity. This will enable the OPCCN to periodically assess whether these protected characteristic groups have been suitably engaged, or whether there is a need for more targeted consultation.

What will the impact on protected characteristic groups be?

(Please describe the potential impact of this policy on any of the nine protected characteristic groups and/or the aims of the general equality duty then rate the impact of the policy as either high, moderate or none. Consider the impact on internal and external staff, service users, the general public and those implementing the policy.)

The consultation will affect people in all protected characteristic groups as the consultation will contribute to the decision on the policing element of local council tax. Therefore, the outcome may affect the quality of service that different protected characteristic groups receive, and the amount of council tax they are required to pay resulting in a potential high impact.

Assessing impact

What relevant information already exists

(This could include customer feedback, surveys, national research or data. Good places to look include Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Foundation. This box is expandable)

The OPCCN undertakes a consultation on the policing precept annually. In addition, other Police and Crime Commissioners nationally and other local government departments undertake consultations on their budget and whether to increase tax or not. All of these sources can provide a template for engaging with the public and ensuring that all views are taken into consideration, including those with protected characteristics.

Who have you engaged with and what did they tell you?

(Please include how you undertook your consultation and how you made it accessible for equality groups. This box is expandable.)

A precept consultation strategy has been developed to help guide who will be engaged with in the course of the consultation, which sets out that the Norfolk public will be consulted on the policing budget for 2020/21. The public sector equality duty sets out that the Office of the Police and Crime Commissioner for Norfolk should have due regard to advance equality of opportunity for protected characteristic groups. This means removing or reducing disadvantage, meeting the needs, and encouraging participation in public life for people with protected characteristics. Therefore, when engaging with the Norfolk public the consultation needs to be accessible to those from protected characteristic groups. The consultation has been developed to ensure that it meets the needs of protected characteristic groups.

In developing the OPCCN's budget consultation, the following have been engaged:

- Norfolk Constabulary
 - Independent Advisory Group (IAG – a voluntary group of Norfolk residents from different community backgrounds who give their opinions and advice to help improve the quality of policing services)
 - OPCCN staff including Equality Officer
 - Police and Crime Panel
 - PCC's Youth Commission
-

What does this tell us about the equality impact of the policy?

Age

How would this group be impacted by the policy?	Is it positive or negative?
The consultation asks people to provide their age, so that this protected characteristic can be monitored. If it is clear that an age group is under represented during the consultation then targeted engagement can take place. It is not anticipated that this protected characteristic will be negatively impacted.	Positive, the OPCCN can ensure this group are engaged with during the consultation.

Disability

How would this group be impacted by the policy?	Is it positive or negative?
Consultations can be difficult to understand for those with learning difficulties. The OPCCN will provide support completing the consultation to people who need it.	Positive, this group are able to engage with the consultation.

Gender identity

How would this group be impacted by the policy?	Is it positive or negative?
The consultation asks people to provide their gender identity, so that this protected characteristic can be monitored. If it is clear that any gender identity is under represented during the consultation then targeted engagement can take place. It is not anticipated that this protected characteristic will be negatively impacted.	Positive, the OPCCN can ensure this group are engaged with during the consultation.

Marriage and Civil Partnership

How would this group be impacted by the policy?	Is it positive or negative?
Whilst this consultation is not collecting information on marriage status, it is anticipated that people who are married or in civil partnerships will be able to access this consultation equally to those who are not. It is not anticipated that this protected characteristic will be negatively impacted.	N/A

Pregnancy and maternity

How would this group be impacted by the policy?	Is it positive or negative?

<p>Whilst this consultation is not collecting information on pregnancy and maternity, it is anticipated that people who are pregnant or on maternity leave will be able to access this consultation equally to those who are not. It is not anticipated that this protected characteristic will be negatively impacted.</p>	<p>N/A</p>
---	------------

Race

<p>How would this group be impacted by the policy?</p>	<p>Is it positive or negative?</p>
<p>The consultation asks people to provide their ethnicity, so that this protected characteristic can be monitored. If it is clear that an ethnicity is under represented during the consultation then targeted engagement can take place.</p>	<p>Positive, the OPCCN can ensure this group are able to engage with the consultation.</p>
<p>The consultation information is very detailed and would be best understood in a person's first language. A translated version will be produced if requested.</p>	<p>Positive, this group are able to engage with the consultation.</p>

Religion or belief or none

<p>How would this group be impacted by the policy?</p>	<p>Is it positive or negative?</p>
<p>Whilst this consultation is not collecting information on religion, belief or non-belief, it is anticipated that those engaged with will be able to be reflective of this protected characteristic. In addition, the OPCCN will be working with organisation that represent the religious groups to ensure the consultation is representative of this protected characteristic. It is not anticipated that this protected characteristic will be negatively impacted.</p>	<p>Positive</p>

Sex

<p>How would this group be impacted by the policy?</p>	<p>Is it positive or negative?</p>
<p>The consultation asks people to provide their gender identity, so that this protected characteristic can be monitored. In this scenario, gender identity enables the sex of responders to be monitored. If it is clear that any sex is under represented during the consultation then targeted engagement can take place. It is not anticipated that people will be impacted by this policy on account of their sex. It is not anticipated that this protected characteristic will be negatively impacted.</p>	<p>N/A</p>

Sexual orientation

How would this group be impacted by the policy?	Is it positive or negative?
<p>Whilst this consultation is not collecting information on sexual orientation, it is anticipated that those engaged with will be reflective of this protected characteristic. In addition, the OPCCN will be working with organisation that represent the LGBT community to ensure the consultation is representative of this protected characteristic. It is not anticipated that this protected characteristic will be negatively impacted.</p>	<p>Positive, the OPCCN will be actively promoting this survey to all sexual orientations.</p>

Are there any gaps in information regarding equality impact?

(This box is expandable)

No

Next steps

Based on the information you have collected, how are you going to lessen any negative impacts that you have identified?

The OPCCN will provide support completing the consultation to people who need it and translated material will made be available on request to the OPCCN. This will ensure that groups needing support or translated information are able to take part in the consultation. Going forward the OPCCN will be developing a policy on accessibility of its published information, which will be informed by the Public Sector Equality Duty. This policy will seek to mitigate different accessibility levels for some protected characteristics.

In addition, as part of the consultation, targeted engagement activity has been planned which will engage some protected characteristic groups. If it is identified during the consultation that one group is underrepresented in the consultation responses, additional targeted engagement activity will be arranged to mitigate the lower levels of engagement.

EIA outcome

Which of the following outcomes does your assessment match?	✓
Outcome 1 – no major change needed – the EIA has not identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken.	
Outcome 2 – Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?	
<p>Outcome 3 – Continue the policy despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:</p> <ul style="list-style-type: none"> • Sufficient plans to stop or minimise the negative impact. • Mitigating actions for any remaining negative impacts. • Plans to monitor the actual impact. 	✓
Outcome 4 - Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination.	

Why did you feel this was the outcome?

(This box is expandable.)

This EIA has identified that there is a negative impact of the consultation approach for two protected characteristic groups because they are required to request information. Both disabled groups and those with low levels are still able to access this information. In addition, the OPCCN will be working to develop a policy which seeks to mitigate different accessibility levels for some protected characteristics in future OPCCN engagement activity. Finally, targeted engagement activity has been planned with these protected characteristic groups.

EIA Action Plan – setting targets and monitoring

Fill in the below table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.

Age

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Disability

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements
Develop information accessibility policy	Set an agreed standard for information accessibility.	TBC	TBC
Provide support to those who need it	Enable those who need support to engage in the consultation to do so	TBC	TBC

Gender identity - trans

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Marriage and Civil Partnership

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Pregnancy and maternity

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Race

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements
Develop information accessibility policy	Set an agreed standard for information accessibility.	TBC	TBC
Translation	Develop translated versions, so that it is fully accessible.	TBC	TBC

Religion or belief or none

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Sex

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements

Sexual orientation

How can we advance equality	What difference will it make	Timescales and lead	Monitoring arrangements