



**HOME OFFICE  
FULL EQUALITY IMPACT ASSESSMENT  
TEMPLATE**

NBPA	EIA
Date	06/12/12

<b>Name of Policy/Guidance/Operational activity</b>
<i>Removal of statutory requirement to conduct Equality Impact Assessments</i>

<b>What are the aims, objectives &amp; projected outcomes?</b>
<ul style="list-style-type: none"> <li>▪ to reduce constraints on the public sector to help reinvigorate the economy</li> <li>▪ Reduce bureaucracy             <ul style="list-style-type: none"> <li>▪ Save time in making policy decisions</li> <li>▪ Save money by redeploying the EIA resources</li> </ul> </li> </ul> <p>Prime Minister David Cameron speech to CBI November 2012          ...“Take the Equality Act. It’s not a bad piece of legislation.          But in government we have taken the letter of this law and gone way beyond it, with Equality Impact Assessments for every decision we make.          Let me be very clear. I care about making sure that government policy never marginalises or discriminates.          I care about making sure we treat people equally. But let’s have the courage to say it, caring about these things does not have to mean churning out reams of bureaucratic nonsense.  <b>We have smart people in Whitehall who consider equalities issues while they’re making the policy.</b>          We don’t need all this extra tick-box stuff.          So I can tell you today we are calling time on Equality Impact Assessments.          You no longer have to do them if these issues have been properly considered.          That way policy-makers are free to use their judgement and do the right thing to meet the equalities duty rather than wasting their own time and taxpayers’ money”...</p>

# 1 SCOPE OF THE EIA

## 1.1 Scope of the EIA work

- This EIA looks at the legality of the policy decision
- Where these guidelines draws on existing policies, these will already have been impact assessed.
- Data contained within this EIA is somewhat limited due to this simply being a screening

## 1.2 Will there be a procurement exercise?

No – the decision was made in-house. It is not known if a targeted partner consultation exercise has been undertaken.

## 2 COLLECTING DATA *(see Module 6)*

### 2.1 What relevant quantitative and qualitative data do you have?

**This may include national research, surveys or reports, or research done by colleagues in similar areas of work.** Please list any evidence in the boxes below (complaints, satisfaction surveys, focus groups, questionnaires, meetings, email, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy/guidance/operational area.

<b>Age</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of age on public sector decision making and policy authorship
<b>Disability</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of disability on public sector decision making and policy authorship
<b>Gender</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of gender on public sector decision making and policy authorship
<b>Gender Identity</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of gender identity on public sector decision making and policy authorship
<b>Human Rights</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of Human Rights on public sector decision making and policy authorship
<b>Race/Ethnicity</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of Race/ethnicity on public sector decision making and policy authorship
<b>Religion/ belief &amp; non belief</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of Religion/belief/non-belief on public sector decision making and policy authorship

<b>Sexual Orientation</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of sexual orientation on public sector decision making and policy authorship
<b>Socio-economic</b>	There is a possibility that if not considered appropriately there will be an adverse impact by reason of socio economic status on public sector decision making and policy authorship

## 2.2 What are the overall trends/patterns in this data?

### POLICE

There is significant under representation of BME people and women in the police service.

- There were 134,101 full-time equivalent (FTE) police officers in the 43 police forces of England and Wales as at 31 March 2012. This is a decrease of 3.6 per cent or 5,009 officers compared to a year earlier.
- There were 6,664 FTE Minority Ethnic officers in the 43 forces of England and Wales, 5.0 per cent of the total police strength, compared with 4.8 per cent on 31 March 2011 (**although the total number of BME decreased**)
- FTE police staff numbers for the 43 forces of England and Wales stand at 67,474, a decrease of 8.8 per cent or 6,536 compared to a year earlier (**2/3 of police staff are female**)
- The total number of FTE police community support officers in the 43 police forces of England and Wales was 14,393, a decrease of 9.0 per cent or 1,427 on the previous year

The majority of BME staff operate at the lower levels of the police service, austerity measures have already adversely impacted on this groups reducing the BME staff levels from **4,999** in 2011 to **4,694** in 2012.

Female staff have been adversely impacted by decisions made to cut staffing levels, being reduced from **51,509** in 2011 to **46,900** in 2012.

## 2.3 Please list the specific equality issues and data gaps that may need to be addressed through consultation and/or further research?

Lack of data is an ongoing issue in the government's decision to remove the requirement to conduct EIAs.

### 3 INVOLVING AND CONSULTING STAKEHOLDERS

(see Module 7)

In this section, describe the data you have gathered through stakeholder involvement and engagement.

#### 3.1 Internal consultation and involvement: e.g. with Other Government Departments, Staff (including support groups), Agencies & NDPBs

- We are not aware of any consultation in relation to this policy decision

#### 3.2 External consultation and involvement: strand specific organisations e.g. charities, local community groups, third sector

- We are not aware of any consultation in relation to this policy decision

### 4 ASSESSING IMPACT (see Module 8)

In this section please record your assessment and analysis of the evidence. This is a key element of the EIA process as it explains how you reached your conclusions, decided on priorities, identified actions and any necessary mitigation.

#### 4.1 Assessment of the impact

- The lack of data limits the government's abilities to target the support and interventions needed to prevent and tackle FGM. However, anecdotal information from internal and external stakeholders highlighted the need for guidelines aimed at front-line practitioners who can make the right interventions and offer the appropriate support.

## Now complete the report and Action Plan.

### The Equality Act 2010

The public sector equality duty consists of a general equality duty, which is set out in section 149 of the Equality Act 2010 itself, and the specific duties which came into law on the 10th September 2011 in England and 6 April in Wales (tbc in Scotland) which are imposed by secondary legislation. The general equality duty came into force on 5 April 2011.

In summary, those subject to the equality duty 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.

### Purpose of the general equality duty

The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities. If you do not consider how a function can affect different groups in different ways, it is unlikely to have the intended effect. This can contribute to greater inequality and poor outcomes.

The general equality duty therefore requires organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected into the design of policies and the delivery of services, including internal policies, and for these issues to be kept under review.

**Compliance with the general equality duty is a legal obligation.**

## 5 REPORT, ACTION PLANNING AND SIGN OFF *(see Module 9)*

### 5.1 EIA Report

The EIA Report is a concise summary of the results of the full EIA. A template is provided at Annex A.

### 5.2 Sign-off

**Now submit your EIA and related evidence for clearance**

<b>Date of completion of EIA</b>	6 December 2012
<b>Compiled by</b>	Tony C Smikle MA
<b>SCS sign-off</b>	

***I have read the Equality Impact Assessment and I am satisfied that all available evidence has been accurately assessed for its impact on equality strands. Mitigations, where appropriate, have been identified and actioned accordingly.***

**Date of publication of EIA Report**

**Review date**

## **5.2 Publication and Review** *(see Module 10)*

Ensure that the EIA Report including the Action Plan are published alongside your policy/guidance/operational activity.

- Based on the available data it is apparent that this policy decision requires a full impact assessment. The absence of an impact assessment by the Home Office in relation to the Prime Ministers decision to remove the requirement to conduct impact assessments is potentially unlawful and may allow for numerous judicial reviews when the general duty is not complied with by the “Smart people in Whitehall”.

**IMPORTANT - Review, revise and update annually!**

## **Annex A - Template for Equality Impact Assessment Report**

**TITLE**

**BACKGROUND**

**SCOPING THE EIA**

**COLLECTING DATA**

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**INVOLVING AND CONSULTING STAKEHOLDERS**

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**ASSESSING IMPACT**

**ACTION PLAN**

## EIA Action Plan

**TITLE: Guidelines**

ACTION / ACTIVITY	OWNER AND INTERESTED STAKEHOLDERS	DEPENDENCIES / RISKS / CONSTRAINTS	COMPLETION DATE	PROGRESS UPDATE