



Equality Impact Assessment

Vetting Policy

Members and staff of the Police Authority are subject to the vetting by the Bedfordshire and Hertfordshire Professional Standards Department through their Vetting and Disclosure Unit. A written document outlines a policy that covers the principles, nature, timing and procedures related to instances where clearance is limited or not granted. This Equality Impact Assessment relates to the policy, found in the Bedfordshire Police Authority website Library section, and not any of the specific procedures undertaken by the force's Vetting and Disclosure Unit.

Available in large print

Stage 1 – Defining the Scope of the Assessment

This section asks you to think about initial planning and risk assessment to make sure that the basic requirements are in place to carry out an equality impact assessment that can improve the way a policy, service, plan or function is delivered.

Setting up – Responsibilities

Carrying out the Assessment
Please state if any external partners/stakeholders are involved in writing, reviewing or approving the equality impact assessment
None

Policy, service, plan or function being assessed
Vetting Policy
Note: This assessment relates to the policy of the Police Authority and not Bedfordshire Police.

Lead Member/Officer carrying out the assessment
Name, title, email and telephone number
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Others to be involved in the process
Other officers and external partners
PA to Chair and Chief Executive
Member Support Officer

Defining the scope of the Assessment / Carrying out an initial risk assessment

What do you think are the main issues relating to equality (ethnicity, gender, disability, sexual orientation, age, gender reassignment, marital/ civil partnership status, pregnancy and maternity, socio-economic disadvantage) within your policy, service, plan or function?

In your response please consider:

- Any impact on the diverse needs of communities in Bedfordshire
- Whether there are barriers to delivering a policy, service, plan or function in terms of equality / diversity either in the aim of the policy or in the way it is delivered
- Whether there are any improvements that can be made and how?
- How you have involved other stakeholders (internal and external) in the process of developing the policy
- What other stakeholders (internal and external) have said about the policy, service, plan or function that is being developed?

A group of Police Authority staff with experience of the operation of this policy met and discussed its previous and potential impact. Time was given to discussing each of the strands of diversity and main categories within them.

Based on the evidence available what is the proposed Impact Assessment Level (high, medium, low) of the policy, service, plan or function?

High – requires a detailed and thorough process with significant external involvement

Medium – requires a reasonably robust process with some degree of external involvement

Low – requires some evidence to confirm that it is in line with statutory duties but external involvement is not needed

LOW

This policy is not part of the prioritised programme of impact assessments currently being undertaken by the Police Authority, but as part of an effort to assess our ongoing work. As this policy largely relates to how the Authority relates to a force function it is deemed to in itself to constitute a low risk in terms of equality and diversity.

Section 2 Impact Assessment

This section asks you to identify whether the proposed policy , service, plan or function may have an adverse impact on equality of opportunity or how relations between different equalities groups may be affected.

Description

Briefly describe the policy, service, plan or function that is being assessed including its aims and objectives.

In your response please consider:

- Who might be adversely affected by the proposed activity?
- Who are the main stakeholders?
- What outcomes are required?
- Does the policy , service, plan or function have any measures to promote equality of opportunity or reduce socio economic disadvantage ?

As described on the title page:

Members and staff of the Police Authority are subject to the vetting at different levels at determined by the vetting policy. This policy is due to be reviewed in July 2011.

The stakeholders for whom equality and diversity implications may be relevant are those individuals being vetted.

What do you think are the main issues that could hinder the effective implementation of equality and diversity within your policy, service, plan or function ?

In your response please consider whether the policy, plan, service or function complements other key activities , e.g. resources.

Limited Authority discretion in clearance process that sits outside this policy.

Assessing Service Delivery and Practical Outcomes

What available data or research have you reviewed or carried out in the process of developing the policy, service, plan or function?

In your response please consider:

- How do current practices and measures affect different groups, eg. by making a positive contribution to equality of opportunity / good race relations or by causing an adverse impact.
- The ways in which policies, services, plans or functions are delivered or communicated and whether there are alternative measures that would have a more positive impact.

None

What are your conclusions on the likely impact of the proposed policy, service, plan or function on different equalities groups?

(ie. race, gender, disability, sexual orientation , age , transgender, religion or faith communities etc.)

Please consider:

- How will the policy impact upon people from different equalities groups and socio economic groups?
- If there is an adverse impact, what are the reasons?

Age

The working group considered whether a greater age increased the likelihood of association with a person with criminal conviction and therefore an increased likelihood of failing the vetting process. It was determined that any potential differing impact on people by age was more strongly linked to other factors.

Disability

Consideration was given to the provision of easy-read documents to assist the vetting process. It was agreed that this measure would not be proportionate as the duties required of a Member, officer or volunteer role within the Police Authority would require strong document reading abilities.

Consideration was given to individual with serious sight impairments. It was noted that the entire website is accessible through 'Browse aloud' software and the mechanism were in place to provide other support if required.

Mental and Emotion Needs

Evidence exists of appropriate assistance being given to individuals with particular mental and emotion needs to ensure that they could undertake their roles. There was however a concern the vetting process could put some people under pressure or strain. It was suggested that this could be prevented if individuals were given prior clarification of what factors would cause an individual to fail their vetting. This risk of this issue is reduced as, although some Members were vetted retrospectively, all individuals now know prior in advance of their application that vetting is required.

It was also noted that it was possible for individuals not to be informed of the reasons for failing the vetting process. After discussion with the working group it was suggested that the Authority should give applicants a single point of contact for any concerns they might have or a 'So you're being vetted?' style leaflet to reassure individuals.

Ethnicity

The working group discussed issues that arise from limited staff awareness of particular names. The group heard that an applicant had been initially rejected due to having the same name and date of birth as another person. This was thought to disproportionately affect particular ethnic groups due to the commonality of Asian names. As in the case of this example, these issues can be resolved through finger printing. This is a rare situation that the Authority may not come across again, but one in which the applicant would need to be given an appropriate level of support.

The discretion of the Vetting Unit is used in circumstances where an individual has been out of the country for a significant number of weeks consecutively in the last three years. The group discussed this after hearing of a particular case where a recent applicant had a job requiring overseas work and was risked not being cleared. This case was resolved through a reference from a public sector employer. The group were concerned that the UK residence policy would have a disproportionate impact upon emerging communities and particularly recent migrants from Eastern Europe. Whilst this is a fixed policy outside the scope of this assessment, the Authority may wish to make particular efforts to raise awareness of opportunities within emerging communities.

Socio-economic Disadvantage

In similarity to the emerging communities discussed above, applicants with a period of homelessness within the last three years may find it difficult to provide the information needed for vetting.

Gender

It was thought that family relationships within some households might limit the financial awareness of some applicants, but that for the purposes of gaining employment or volunteering all would be able to obtain the financial information to complete the vetting form.

The working group were confident that any information relating to gender-reassignment would remain confidential. Whilst it would be revealed through a change of name and other information it would remain private due to confidential nature of the whole process and the professionalism of the unit undertaking it.

Sexual Orientation

Similarly to the previous section an applicant's partner's name may indicate an individual's sexuality, but no impact adverse was thought to result due to the nature of the process confidential process.

What can be done to reduce any potential adverse impact ?

Please consider:

- For example, changes in communication methods, language support, disability measures, changes in eligibility criteria, engagement activity, shared targets with other partners etc.
- Factors that can hinder the implementation of the suggested measures such as financial resources, competencies, managerial support, etc.

As above

External involvement

What do stakeholders think about the policy, service or function that you are developing?

Please consider:

- Please use this section to describe how you have consulted/ engaged with key stakeholders in the process of developing the policy, service, plan or function.

Not known

Stage 3 – Conclusions & Recommendations

This section should set out what you need to do to deal with any adverse impact, or identified lack of positive impact of a policy, service, plan or function on equality.

What are the main conclusions and the key recommendations of the equality impact assessment?

Please consider:

- Does the policy consider and address the specific needs of specific equalities groups?
- What gaps can be immediately addressed and what will require wider decisions
- Whether the policy will directly or indirectly have an adverse impact on any equality group? What actions will be taken to mitigate this impact?

The vetting policy is not thought to have a significant disproportionate impact upon an particular individuals or groups. A small number of concerns were raised as outlined in the action plan below.

Stage 4 – Implementation and Review

Please use the following template to develop any actions required:

Actions Required	Timeframe	Responsible Officer / Member	Relevant Performance Indicators
Consider a 'So you're being vetted?' style leaflet to reassure individuals to avoid unnecessary strain felt by individuals with particular mental or emotional needs.	None	Member Support Team	
The Authority should consider making particular efforts to raise awareness of opportunities within emerging communities some of whom will be disproportionately affected by three year residence requirements.	Ongoing	All	