

Text highlighted in blue must not be changed

EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment Standard Operating Procedure/Guidance **must** be used when completing this form:

Protective Marking:	Not Protectively Marked	Publication	Yes
Title:	Equality Impact Assessment for the Recruitment and Selection Policy		
Branch / OCU:	People Support Recruitment		
Date Created	April 2012	Review Date:	April 2016
		Version:	1
Author:	Business Development Manager, People Support Recruitment		

1. Aims and Purpose of Proposal – see step 1 of the guidance

This Policy sets out the procedure for recruiting new members to the Metropolitan Police Service (MPS) and includes all ranks of Police Officers, Metropolitan Special Constables (MSC), Transfers/Rejoiners and Police Staff including the Extended Police Family. It also provides guidance on internal selection for all Police Officers and Police Staff. The policy and associated standard operating procedures are compliant with prevailing employment law and standards, guidance and procedures prescribed by regulatory bodies, including Association of Chief Police Officers (ACPO) and Nation Police Improvement Agency (NPIA).

The desired outcome of the Policy is that the MPS has the necessary human resources it requires for it to meet all its Policing obligations. Success is measured both in quantitative and qualitative terms. Each year there will be recruitment targets set for external recruitment, and needs will also be identified in relation to internal movements. The policy provides a framework to help staff ensure those targets are achieved in a manner that reflects current good practice. The public of London benefit from having a well resourced, correctly skilled police service. Internally resourcing has huge implications regarding workloads and skills profiles required.

There have been a number of changes to the seven accompanying Standard Operating Procedures (SOPs) in response to legislative change, internal reorganisations and process improvements. These include:

- The removal of the default retirement age
- A new recruitment model for police officers
- Response to the Immigration, Asylum and Nationality Act
- Response to the Equality Act including moving the use of sickness / absence data to after the selection decision has been made for all external candidates, or joint internal / external recruitment campaigns.
- Launch of HR People Services Delivery Model

- Introduction of the order of recruitment eligibility
- The introduction of the Metropolitan Performance Framework to replace the Integrated Competency Framework

Anticipated changes in the forthcoming review period are:

- Response to the Agency Worker Regulations
- Response to the review of the implementation of HR People Services Delivery Model

2. Examination of Available Information – see step 2 of the guidance

Application and joiner data covering a 42-month period has been used to provide estimates for the success rates of different groups. A 42-month period was used to ensure that greater part of the applicants who applied since the introduction of the new process in 2007 will have completed the recruitment process (selection takes around six months due to the extensive background checks for all posts). The application data covered the period April 2007 to September 2010, whilst the joiner data covered the period October 2007 to March 2011. Whilst data relating to age, ethnicity and sex are available for analysis, data relating to the other protected characteristics was not available for the current analysis. The Duty in Employment report provides a corporate analysis of the other protected characteristics.

See also the Equality Impact Assessment for the new recruitment and training framework for regular police officers, providing details of the potential risk of inequalities arising from the new approach and controls established to help mitigate these risks.

3. Screening Process for relevance to Diversity and Equality issues – see step 3 of guidance

Does this proposal have any relevance to:

a)	Age	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
b)	Disability	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
c)	Gender	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
d)	Gender Reassignment	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
e)	Marriage and Civil Partnership (employment only)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
f)	Pregnancy and Maternity	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
g)	Race	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
h)	Religion or Belief	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
i)	Sexual Orientation	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
j)	Other Issues	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

4. From the answers supplied, you must decide if the proposal impacts upon diversity or equality issues. If yes, a full impact assessment is required.

Full Impact Assessment Required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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5. Consultation / Involvement – see step 5 of the guidance

Who was consulted?

In preparing this Equality Impact assessment (EIA), consultation has taken place extensively within **PeopleSupport** Recruitment to utilise the knowledge of as many staff as possible. In order to be able to address the issues raised by the Diversity and Citizen Focus Directorate (DCFD) in their feedback on the initial draft of this EIA, a meeting took place, to which all the Heads of Department within **PeopleSupport** Recruitment were invited. The Human Resources (HR) Directorate Policy Manager went through each item of feedback and sought answers from the attendees. That information has been incorporated into this version of the EIA. Consultation has taken place with;

- Trainee Police Constables, trainee Metropolitan Special Constables and trainee Police Community Support Officers (PCSOs)
- **PeopleSupport** Recruitment Senior Management Team
- **PeopleSupport** Recruitment Heads of Departments
- Association of Muslim Police
- Metropolitan Police Service Chinese and South East Asian Staff Association
- Association of Senior Female Police Staff
- Disabled Staff Association
- Association of Senior Women Officers
- Metropolitan Police Service Emerald Society
- British Association for Women in Policing
- Metropolitan Police Service Greek Staff Association
- Catholic Police Guild
- Metropolitan Police Hindu Association
- Christian Police Association London Branch
- Metropolitan Police Ibero-American Association
- Gay Police Association
- Metropolitan Police Sikh Association
- Jewish Police Association
- Metropolitan Police Turkish and Turkish-Cypriot Association
- Metropolitan Black Police Association
- Police Anglo Italian Association
- Diversity and Citizen Focus Directorate (DCFD)
- S.A.M.U.R.A.I - Staff Support Associations
- Commanders - Boroughs, Specialist Crime Directorate, Specialist Operations and Central Operations (CO)
- Superintendents' Association
- Metropolitan Police Authority (MPA)
- MSC Operational Command Unit
- NPIA
- Association of Chief Police Officers (ACPO)
- Strategic research and Analysis Unit
- Director of Legal Services (DLS)
- Public, including Greater London Assembly (GLA)
- Police Federation
- Union Representatives

<p>Date and method of consultation</p>
<p><u>2007/2008</u></p> <p>A series of focus groups took place with candidates who had recently been through the recruitment process, to ascertain the impact any element of the Policy or associated Standard Operating Procedures had on them. This included two focus groups with each of the following groups - Trainee Police Constables, trainee Metropolitan Special Constables and trainee Police Community Support Officers.</p> <p>In the more formal consultation stakeholders, staff associations and authorities listed above were consulted by way of sending a draft copy of the Standard Operating Procedure for their review and comment. Further discussions were held with a Transforming HR (THR) Consultation Panel to discuss the matter.</p> <p>A programme of consultation took place during April – June 2010 with a wide range of stakeholders. Further consultation with members then took place during July 2010 before the MPA Full Authority meeting to further consider the proposal.</p> <p><u>Police Officers applying for Police Staff roles</u></p> <p>Consultation with the Police Federation and Union sides took place prior to presentation of the proposal to Management Board in July 2011.</p> <p><u>2010</u></p> <p>The entire senior management team within the then Recruitment Directorate, now PeopleSupport Recruitment, reviewed the recruitment and selection policy and all the SOPs that fall under it to ensure they were THR compliant during summer 2010 in preparation for the launch of PeopleServices in November 2010. As part of that review any areas that were found to be out-of-date were amended also.</p> <p>For two days in November 2010 inductees to PeopleSupport Recruitment reviewed the Policy and Standard Operating Procedures through a series of classroom based exercises and focus groups, together with work in smaller groups.</p>
<p>Where are the consultation records stored?</p>
<p>Business Development Unit, PeopleSupport Recruitment and PeopleSupport Recruitment Strategic Centre.</p>
<p>Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?</p>
<p>The proposal entitled 'Police Officers applying for Police Staff roles' which went to Management Board on 8 July 2011 written by the Director Recruitment did not identify any equality and diversity implications.</p>

Directorate of Legal Services in support of the proposal advised that police staff employees selected for redundancy must be considered for suitable alternative roles within the MPS to try to avoid compulsory redundancies in so far as possible. Seeking redeployment is an important consideration illustrating the fairness and reasonableness of the dismissal process. As a matter of law, any dismissals would be for a potentially fair reason, which would justify dismissal. But in order to show that it is a fair dismissal, it is also necessary to demonstrate that the MPS has acted reasonably. An Employment Tribunal will expect, having regard to the size and administrative resources of the MPS, that we should use dismissal as a last resort and unless we can demonstrate that we had done all that we reasonable can to avoid dismissal, by providing suitable alternative work, there is likely to be an unfair dismissal finding.

The Organisational Change (Police Staff) Standard Operating Procedure provides that once notice has been served and staff are on the police staff posting list, they have priority for vacant roles. This report points out that in a fast moving environment we should consider further pre-redundancy measures in order to avoid compulsory dismissals. This assists the MPS in demonstrating the fairness of the process.

As part of the local induction programme designed for the THR new starters, sessions were conducted by the group to review the Standard Operating Procedures owned by Recruitment. These SOPs included, Eligibility Criteria, Pre-Assessment Activity, Assessment Process, Post Selection Activity, Recruitment Appeal Procedure, Recruitment Candidates with Dyslexia, Medical Standards' and Screening and Data Management.

The overall feedback from the groups mainly pointed out typing errors and issues with the general format of the text. There was however a general opinion that abbreviations should be explained more thoroughly, also some further clarification was needed of the terminology used that specifically related to HR procedures to make the SOPs easier to understand for staff outside of the HR community.

6. Full Impact Assessment – see step 6 of the guidance

Explain the potential impact (whether intended or unintended, positive or negative) of the proposal on individuals or groups on account of:

Age

The eligibility criteria for recruitment to the MPS SOP contains rules on the age range acceptable for employment into the various roles we recruit. For Police Officers they are based on NPIA Circular 02/2011, Eligibility Criteria for the role of Police Constable.

The upper age limit for Police Staff was removed in May 2011 in line with the requirements of the Default Retirement Age (Employment Equality (Repeal of Retirement Age Provisions) Regulations 2011.

The lower age limits reflects the guidance on the Direct.gov.uk website regarding young and child workers, including restrictions on working shifts.

Disability

The Home Office produced guidelines; Circular 59/2004 refers, detailing the medical standards, and Circular 25/2003 for eyesight standards, which all police recruits have to meet. These are the most recent guidance issued.

For all other roles, the medical team requires copies of the role profile, job description and person specification to allow them to assess the suitability of the candidate for the demands of the role. The Equality Act applies to candidates who have protected characteristics. The MPS Standard Operating Procedure (SOP) encompassing these Home Office Guidelines stipulates that each candidate will be assessed individually in the light of professional information and judgment. However, candidates unable to fulfill the demands of the role may be excluded from taking up employment, except where reasonable adjustments can be made.

There is a separate SOP detailing procedures for candidates with dyslexia who require extra time or adjustments to the recruitment process.

In accordance with the Equality Act 2010 the following processes have been adopted in relation to the use of attendance / sickness information:

Recruitment campaigns with ONLY Internal candidates.

The MPS will continue to require candidates to provide their last three years sickness data at the beginning of the recruitment process together with the application form, and candidates who do not meet the criteria outlined in the MPS Attendance Management Policy (AMP), may be paper sifted prior to any assessment.

Recruitment campaigns with ONLY External Candidates

Attendance / sickness information will not be assessed till after the selection decision has been made. If it subsequently transpires that the chosen candidate does not meet the standard, as outlined in the MPS AMP, then any provisional offer of a post will be withdrawn. The Recruiter will then check whether the next highest scoring candidate on the select list meets the required standard. This process will continue till either a suitable candidate is chosen who passes both the assessment, and then meet the standards laid out in the MPS AMP, or the select list is exhausted and no suitable candidates are identified.

Recruitment campaigns with BOTH Internal and External Candidates

The process outlined above for 'external candidates' will be followed. This is to ensure that the same rules are applied for candidates applying simultaneously for the same recruitment campaign.

Recruitment campaigns with agency worker applicants

The process outlined above for 'external candidates' will be followed. This is to ensure that the same rules are applied for candidates applying simultaneously for the same recruitment campaign.

There may be occasions when it becomes apparent before an 'internal candidates only' recruitment campaign is completed that there are not sufficient candidates to fill the roles required. If the decision is then taken to start to advertise externally also then it will be

<p>deemed that these are separate campaigns, as they are not simultaneous. In this instance the different rules above that relate to each group can be applied.</p>
<p>Gender</p> <p>The new recruitment and training framework for regular police officers requires new entrants to have served as MSC and been accredited with independent patrol status, or be serving PCSOs . The EIA identified the risk that primary carers (predominantly women) are more likely than men to be unable to commit sufficiently to the MSC to develop the skills and knowledge to the requisite level, thus potentially resulting in exclusion from the regular police service. A third pathway for external applicants is being developed to mitigate this risk.</p>
<p>Gender Reassignment</p> <p>Transsexual candidates for police officer roles are advised by the medical team during the recruitment process about the need for search exemption certificates. MetHR allows for staff to self declare once they become employees. Prior to employment candidates are asked for this information, however may choose to leave it blank.</p>
<p>Marriage and Civil Partnership (employment only)</p> <p>It is unlikely that the proposal will lead to differential impact within this strand.</p>
<p>Pregnancy and Maternity</p> <p>It is unlikely that the proposal will lead to differential impact within this strand.</p>
<p>Race</p> <p>The recruitment data reveals significant differences between the success rates of different ethnic minority groups. The differences are partly due to the application of the ACPO-prescribed nationality and residency eligibility criteria, where BME (Black and Minority Ethnic) candidates are around three times more likely to fail than white participants, and criteria relating to previous convictions and associated checks, where BME candidates are around twice as likely to fail than white candidates. The assessment centre accounts for the bulk of candidates failing the selection process, with lower pass rates are associated with BME candidates (e.g. during the regular police SEARCH assessment centre BME candidates are around two-half times more likely to fail than white candidates). The EIA for the new recruitment and training framework identified the risk that candidates with low economic capital are likely to be excluded from the regular service due to the voluntary nature and time commitment required for service in the MSC; this is likely to impact upon some BME groups.</p> <p>After conducting market research the Attraction and Recruitment Team have developed a bespoke diversity Specials recruitment campaign. It is aimed at influencers/relatives who are typically 1st and 2nd generation migrants to the UK focusing on people from Black and Asian communities. The message focused on the relatives speaking about how they felt about their son, wife or daughter being a Special, the press campaign was also supplemented by editorial.</p>

<p>Religion and Belief</p> <p>Generally, business groups adopt a flexible approach to accommodating the particular needs of different faith groups of members of staff (e.g. Sabbath, worship, etc.). According to recruitment data whilst the number of candidates who fail vetting checks are relatively low, Muslim candidates are around four times more likely to fail nationality/residency checks and around twice as likely to fail on the basis of the convictions criteria and associated checks than Christian candidates. This issue is owned and reviewed by SCD26 (Vetting).</p> <p>After conducting market research the Attraction and Recruitment Team have developed a bespoke diversity Specials recruitment campaign. It is aimed at influencers/relatives who are typically 1st and 2nd generation migrants to the UK focusing on people from Black and Asian communities. The message focused on the relatives speaking about how they felt about their son, wife or daughter being a Special, the press campaign was also supplemented by editorial.</p>
<p>Sexual Orientation</p> <p>There are no restrictions on anyone within these categories from joining the MPS in any role. MetHR allows staff to self-declare once they become employees. Prior to employment candidates are asked for this information, however may choose to leave it blank.</p> <p>Historically, consensual gay sex was unlawful. Whilst the law has since changed, there are likely to be older candidates who have been convicted under the old law; CRB checks will reveal the conviction(s). Such cases will be passed to vetting to be considered, rather than an automatic rejection.</p>
<p>Other Issues</p> <p>As mentioned above there are residency criteria that any candidate for any role have to meet which could potentially disadvantage some asylum seekers. Due to vetting requirements, it could also be difficult for anyone homeless for the last three years to join the MPS due to the need for addresses, which can be checked. There are no other obvious categories of people, not already mentioned, who would be disadvantaged by this policy or associated standard operating procedures. The MPS has a flexible working policy, and requests for flexible working patterns, by new entrants to the Service are always considered and wherever possible are accommodated.</p>

<p>7. Monitoring – see step 7 of the guidance</p>
<p>a) How will the implementation of the proposal be monitored and by whom?</p> <p>The Strategic Workforce Planning Unit will be responsible for the review of this Policy and its associated Standard Operating Procedures in accordance with current equalities legislation. How the Policy is monitored is currently under review.</p>
<p>b) How will the results of monitoring be used to develop this proposal and its practices?</p> <p>Due to issues with IT systems, how this policy is monitored is currently under review.</p>

c) What is the timetable for monitoring, with dates?

Due to issues with IT systems, how this policy is monitored is currently under review.

8. Public Availability of reports / result – see step 8 of guidance

What are the arrangements of publishing, where and by whom?

The Recruitment and Selection Policy EIA is published by the Policy Co-ordination Unit on the MPS publications scheme.

MP 63/11