

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 Standard Operating Procedure for Detective Rotation - the deployment and posting of detectives				
Branch / OCU:	HR Workforce Deployment				
Date Created	Oct 2011	Review Date:	Oct 2015	Version:	5
Author:	Human Resources Directorate				

Decision Making

What is the decision?

Reject the proposal Yes ☐ No ☒

Implement the proposal Yes ☒ No ☐

Produce an alternate proposal (if so, a new impact assessment must be completed) Yes ☐ No ☒

SMT / (B)OCU/Management Board endorsing decision

Name: Rank or Grade:

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

- The proposed Standard Operating Procedure (SOP) has the following aims:

To provide a structured and non discriminatory framework for the deployment and posting of detectives, setting out the process for managing the implementation and operation for the detective rotation programme which will over time support the corporate aim of having an effective and efficient distribution of detective skill and experience across the Metropolitan Police Service (MPS). The SOP will assist line managers and Borough / Operational Command Unit (B/OCU) Commanders with the decision making process in relation to rotation. It will ensure the managed movement of detectives between business groups in support of MPS corporate priorities.

- How will implementation and progress be measured and monitored

This is a new standard operating procedure, however it will sit alongside the principles contained within the Police Postings SOP and under the overarching Workforce Planning Policy. Although

this SOP is new, the process has been developed over a period of time and has been tested over a number of distinct tranches which have resulted in the movement of some 150 detectives from the specialist business groups to Territorial Policing. This staged approach has allowed the project team to effectively assess the impact of the detective rotation process on all groups and to make any necessary amends before formal publication.

The detective rotation process (DRP) has been closely reviewed and monitored following each of the distinct tranches of movement. This has involved direct feedback from key stakeholders and individuals involved: officers who have moved, line managers, Business Group Command Teams and the Police Federation and Superintendent's Association. This has allowed the project team to adapt and amend any areas where the framework may not have been as effective as planned or where it has potentially had an adverse impact on any one particular group.

Close liaison with key stakeholders such as the Police Federation, who have played a significant role in developing and supporting the DRP, so that the framework can deliver in the interests of the individuals and the MPS as a whole.

A formal review structure has been created through the Detective Career Management Programme Board which is chaired by the Assistant Commissioner Specialist Crime (ACSC) and staffed by a wide range of representatives from across the Business Groups as well as the Federation and Superintendents Association. The Board has commissioned a formal review of each tranche and each time the organisational learning has been incorporated into the general guidance which has been published on the People Pages.

In line with usual police officer posting activity, diversity data is captured from officers who are selected for movement under the DRP so that trends and any propensity towards disproportionality can be carefully monitored and action taken if any individual or group of individuals has been placed at a disadvantage.

- Who are the key stakeholders:

The key stakeholders are the Metropolitan Police Service (MPS), Director of People Services, Strategic Centre for Recruitment and Workforce Planning, Workforce Deployment Unit, Business Groups, Borough Operational Command Units (BOCU) and Operational Command Units (OCU) and all officers who have formally been selected, through a corporate MPS process, as detectives, and managers within the organisation. The beneficiaries will be the MPS as a whole and the communities we serve. The SOP will ensure that detectives are posted and deployed, taking into account their skills and experience, in the best interests of the organisation as a whole. Whilst officers will be encouraged to build their career around individual aspiration, ability and preference, the operational needs of the MPS will take precedence. This will contribute towards ensuring the best possible use of MPS human resources improving customer service, performance and value for money to the benefit of London and all its communities.

- Who will be impacted by the desired outcome or purpose and in what way:

Police officers, who are detectives up to and including the rank of detective sergeant, plus current and future line managers will be effected by this SOP as well as those with strategic workforce planning and succession planning responsibilities. The desired outcome is to ensure a more equitable and therefore efficient distribution of detective skill and experience across the MPS. The SOP will offer clear principles and processes to be followed, thus allowing individual officers and their managers clear guidance about managing and developing careers aspirations against the over riding operational priorities of the organisation.

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

- What information is needed to ensure all perspectives are taken into account

Internal consultation – there has been engagement with stakeholders and those officers who will be effected by the Detective Rotation Process (DRP). This includes a collaborative approach to developing the framework and formally seeking feedback on the draft framework from the Police Federation, Superintendents Association, members of the SAMURAI (Support Associations Meeting Up Regularly And Interacting) group, which includes the Disability Staff Association, HR Board and the Diversity and Citizen Focus Directorate. Additionally the SOP has been reviewed through the Detective Career Management Programme Board, whose membership includes staff associations, senior police officers, senior HR representatives and members of the MPS Management Board.

External Consultation – an examination of whether any similar rotation processes existed within other Police Forces was undertaken, and whilst no good comparators were identified at that time, other Forces have considered visiting the MPS to understand this approach to managing detective resources. Merseyside Police have adopted a very similar process and the National Policing Improvement Agency (NPIA) have commended the detective rotation framework as an example of good practice. As the guidance for delivering detective rotation has now been effectively tested over a number of tranches, additional consultation work has been commissioned with external partners to assess whether there has been any impact following the introduction of the scheme from their perspective. Specifically a meeting has been arranged with key members of the Trident Independent Advisory Group (IAG) to discuss detective rotation, its aims and objectives and also to take the opportunity to highlight some of the positive outcomes in terms of sharing organisational learning.

- What current internal and external quantitative and qualitative data is available

The aim of the SOP is to create a more equitable distribution of detective skill and experience and therefore data has been collated to illustrate the stark reality of detective experience levels within the Territorial Policing (TP) Boroughs. This clearly shows the very high numbers of trainee detective constables (TDCs) within Borough Operational Command Units, which amounts to approximately 50%, presenting a significant reputational risk for both the individual and the MPS. Comparative data has been developed to ascertain the impact that the DRP has had on TP experience levels and this will be used in inform future numbers. The early results suggest that the increase in experience levels is slow, which was expected as the rotation process only seeks to move relatively small numbers of officers. However, there is growing anecdotal evidence to suggest that having experienced officers, from specialist backgrounds, working alongside more junior colleagues, is opening up the range of opportunities that are available within the detective career group.

Diversity data is maintained for all posting processes allowing for analysis of the diversity of officers who have transferred through the Posting Panels. This allows for regular assessment of the data to ensure that there is no disproportionality or disadvantage to any individual by virtue of any of the protected characteristics, as defined within the Equality Act 2010 (Age, Disability, Gender, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or belief, Sexual Orientation and any other issues)

- Has the process been designed through engagement with service users? Which communities or individuals have been approached for advice or views.

Yes, although the focus has been on internal consultation with key stakeholders within the MPS, including the Police Federation, Superintendent's Association, the SAMURAI (Support Associations Meeting Up Regularly And Interacting) group, HR Board, Diversity and Citizen Focus

Directorate and officers who have been subject to the DRP.

The original draft of the SOP was developed in collaboration with the Federation and has been circulated widely amongst senior detectives for views and constructive feedback. This group has played a significant role in formulating the framework supporting the DRP. Additionally the trial period which has run for over a year in the form of guidance has allowed constructive feedback from all those involved in the process and has resulted in a number of key changes and amendments to the original drafts. Specifically in relation to the posting of officers who are nearing the end of their service and those who have flexible working patterns.

The project team have also consulted with a number of external police forces including Hampshire and Hertfordshire to consider other models of detective deployment to assess whether they could offer any advantage to the MPS.

- Is there a need or additional research, further engagement or consultation:

Absolutely yes. Research, engagement and consultation will remain ongoing as this SOP and the detective rotation process are still relatively new. The process will therefore be both affected and influenced by changes in corporate priorities as well as developments in organisational learning through Fairness at Work and possibly Employment Tribunal activities. New case law and statute may also have an impact and any new legislation such as the Equality Act 2010 must be carefully considered to ensure this SOP and all others are fully compliant.

It will remain important to continually analyse diversity data and specifically ensure that all postings are closely monitored to ensure there is no disproportionality.

Additionally, now that the process has been running with guidance for a period of time, it is the ideal opportunity to seek the views of our external partners, as the organisation is far clearer on the impact of rotation on both specialist and borough OCUs.

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	☒	No	☐
b)	Disability	Yes	☒	No	☐
c)	Gender	Yes	☒	No	☐
d)	Gender Reassignment	Yes	☐	No	☒
e)	Marriage and Civil Partnership (employment only)	Yes	☐	No	☒
f)	Pregnancy and Maternity	Yes	☒	No	☐
g)	Race	Yes	☐	No	☒
h)	Religion or Belief	Yes	☐	No	☒
i)	Sexual Orientation	Yes	☐	No	☒
j)	Other Issues	Yes	☒	No	☐

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	☒	No	☒
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5. Consultation / Involvement – see step 5 of the guidance
Who was consulted?
The consultation phases have been managed through the Strategic Centre for Recruitment and Workforce Planning who have aimed to ensure the involvement of all stakeholders in developing the detective rotation framework and its associated guidance. The consultation has taken place to ensure that the views and needs of both the organisation and the individuals who will be affected, have been taken into account and any potential adverse impacts have been fully considered with mitigating action where ever necessary. The consultation has involved seeking the views of a broad group of stakeholders, including staff, managers and representatives from across all the Business Groups, to ensure a wide range of views and experiences have been taken into account and incorporated into the development phase of the process. The group has included detectives who will be included within the detective rotation process. The latest version of the SOP also incorporates feedback on the guidance from the Police Federation, Superintendent's Association, SAMURAI group, HR Board, Diversity and Citizen Focus Directorate as well as a diverse range of detectives of all ranks across the Business Groups. A specific meeting was held with the Diversity and Citizen Focus Directorate to systematically work through the guidance which has now been developed into the SOP, to ensure it is fit for purpose and contains no potentially discriminatory criteria. As an ongoing action, further consultation has taken place with the specialist OCUs to ensure that the rotation of officers is not adversely impacting upon operational capability and capacity. This has proved to be particularly valuable and has resulted in further amendments to the detective rotation guidelines, specifically in relation to officers with fairly unique skills that would be difficult to replace and disproportionately costly. This consultation is being further expanded to include our external partners and to assess the impact where a unique skill may be defined as a special relationship with a partner organisation that would damage the MPS either operationally or reputationally if it were broken. Initial feedback has indicated that such relationships are quite rare and allowing B/OCU Commanders the discretion to exempt such individuals for a period of time will allow for succession planning activity to be undertaken. Following advice from the Diversity and Citizen Focus Directorate, external consultation with Independent Advisory Groups (IAGs) will now be undertaken. They are likely to be an extremely valuable source of feedback, particularly as the process has been trialled and meaningful information of impacts can be shared. In the first instance meetings have been arranged with the SCD8 (Trident) IAG and the SCD5 (Child Protection Command) and their feedback will be incorporated into the Equality Impact Assessment and if necessary the SOP, as part of the ongoing review process.
Date and method of consultation
Consultation has taken place over an extended period of time, commencing during the Autumn of 2009. The draft principles were originally developed following concerns raised by the Federation and shared by Management Board, that there were significant vulnerabilities in terms of crime investigation at a local Borough level due to the high level of inexperienced and in many cases, newly selected trainee detective constables. A concern that has been borne out in the press on many occasions following high profile investigations carried out within Territorial Policing.

The original draft guidance was drawn up following a series of meetings between HR representatives, senior detectives and the Police Federation and was formally circulated to the Staff Associations through the SAMURAI network for views. It was also circulated to the Trade Unions, although their members would not be directly affected by the detective rotation process. The process has been trialled in the form of guidance and this has provided some very useful and constructive feedback together with some valuable organisational learning, all of which have been incorporated into the SOP.

The draft SOP was circulated to members of the Detective Career Management Programme Board and HR Board for review and comments. This has also resulted in further, wider consultation as Board members sought the views of their Business Group colleagues. Following this stage, the draft guidance and underpinning principles have been presented to Management Board on a number of occasions throughout 2009 and 2010, where they were formally agreed. Additionally, a number of reports have been commissioned by the Metropolitan Police Authority (MPA) on detective capability and capacity, which gave an opportunity to update members on detective rotation at their Human Resources and Remuneration Sub Committee in June and December 2010.

Where are the consultation records stored?

The records of the feedback, together with the copies of the formal reports and various iterations of the equality impact assessments, guidance and standard operating procedures are stored electronically and hard copies are contained within the General Registry File, currently stored at Empress State Building (ESB). OG11/11/36 refers.

Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?

The detective rotation framework was developed over a period of time and in consultation with a wide variety of internal and external stakeholders. Allowing the process to be introduced as guidance, under the Police Posting Standard Operating Procedure, has also allowed and encouraged constructive feedback from all those involved with the management and deployment of detectives. This feedback, together with the reviews undertaken at each stage of the implementation, has resulted in some key changes to the draft documents.

Following the first tranche of movement a focus group was held with the officers who had been identified for moves, OCU Commanders and other senior detectives involved in the development of the framework. This proved to be a very valuable source of constructive feedback. There was an almost unanimous view that officers who were in their final year of service should not be included in rotation. This view was strongly supported by the Federation and with immediate effect the guidance was updated to show that OCU Commanders had the authority to exempt those officers in the last year of their service, provided they have confirmed their intention to retire.

A further area that has caused concern amongst officers, line managers and the Federation is the posting of individuals who have flexible working patterns which worked to the benefit of the individual and their specialist OCU but could not be accommodated on the TP Boroughs. This has presented an opportunity to re-iterate the MPS Flexible Working SOP and the guidance contained within it. It is particularly important that officers and line managers understand that flexible working patterns must be reviewed at least on an annual basis and that there is no automatic right to carry over an existing flexible working pattern to a new role. However, this must be balanced against all the hugely positive aspects of the encouraging a work life balance and flexibility is required on all sides to ensure the needs of the individual and the MPS are considered.

All transfers are managed through the Workforce Deployment Unit and the team will work with officers with flexible working patterns to secure suitable roles. It may be necessary, as a reasonable adjustment, to allow additional time to identify suitable roles and locations for officers who wish to retain a flexible working pattern, however it is essential that all parties remain as flexible as possible.

A number of Specialist OCU Commanders expressed some concerns that using the criteria of length of service away from TP, could adversely impact upon some areas of specialism as all their officers would fall within that category. This was recognised as an issue for a number of issues including; the potential loss of all skills and experience within a unit, loss of continuity and the cost of up skilling new staff members. Whilst it was widely agreed that, whole units should not be exempted, there was certainly a case for the OCU Commander to have the discretion to manage the loss of skill to mitigate the potential impact. This has been introduced and now allows OCU Commanders to succession plan over a period of time without adversely affecting operational performance.

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

Although clearly not the intention, there is a possibility of adverse impact upon officers who are longer in service and therefore older in years. This was recognised during the first tranche of movement as the key criteria for selecting officers for transfer is the length of time served away from TP, starting with those who have been away from Borough based policing the longest. The majority of those affected were longer in service and some were very close to retirement.

In order to mitigate any potential for an adverse impact, this criteria was reviewed and additional guidance was developed which allows OCU Commanders the discretion to consider those officers who are in their last year of service and if they have firmly indicated their intention to retire, to exempt them from the DRP and thus allow them to remain within their specialism until their retirement date. This data is reviewed and if an officer, later, chose to remain within the MPS, they would then again be subject to rotation. This will allow discretion for officers nearing the end of their service whilst still ensuring that the organisational and operational needs of the service are satisfied.

It is important to note that police pensions can be drawn at 30 years or officers may choose to continue serving up to their 60th birthday - the Compulsory Retirement Age (CRA) for officers up to chief inspector remains at 60, however they can submit a request through line management to remain beyond that age, and research shows that year on year approximately 50% of those who are eligible to retire will actually retire.

Therefore the DRP must be inclusive and ensure that officers with 29 years, or more, service are managed within the framework and that no assumptions are made by virtue of either their age or length of service. The key is communication through effective line management.

The evidence to date has shown that some officers have chosen to retire from the MPS whilst others with more than 30 years service have transferred to TP Borough and continued to offer a high level of detective skill and experience. Officers employed on the 30+ scheme who have been employed to perform a specific role will not be subject to detective rotation.

This area will continue to be closely monitored and if necessary the framework will be adapted or

additional guidance developed to assist OCU Commanders, line managers and individuals.
Disability
As the key aim of the DRP is to actively create a more equitable spread of skill and experience it is important that it remains an entirely inclusive process and officers with specific needs i.e. those on restricted duties, and / or with disabilities will be managed within the framework, ensuring that reasonable adjustments are made where ever practicable within the parameters of the law. Through the use of reasonable adjustments the MPS can ensure that the physical environment, including equipment or reasonable adjustments to working patterns, can be adapted to create a safe and inclusive working environment. This will enable staff on restricted duties or with disabilities to maintain an active involvement in the MPS and to continue to make a positive contribution to policing London. It will be essential that line managers work with individuals who are close to falling within the 8 years away from TP criteria to ensure that they are fully engaged with the process and play an active role in determining their next posting. This is particularly critical in cases where reasonable adjustments have been agreed and will need to be transferred and continued within the new working environment. Line managers and individuals must ensure that, where necessary, close liaison with Occupational Health professionals is maintained to assist in the transfer process. Additionally, the Disability Staff Association can offer an advisory service for individuals and new line managers to ensure that the MPS meets all of its legal and moral obligations in providing a reasonable adjustment. Line managers must be aware that there will be occasions when an officer who is on restricted duties or who has a disability may not have a suitable role identified within Territorial Policing. In such instances, the 'reasonable adjustment' may be to allow the individual to remain in their current role until a new role that meets their specific needs can be identified.
Gender
No MPS employees will be discriminated against with regard to their gender or marital status as a result of the Detective Rotation Process.
Gender Reassignment
No MPS employees will be discriminated against with regard to their gender re-assignment as a result of the Detective Rotation Process. If an individual who has undergone gender re-assignment, requires specific support in relation to their transfer then reasonable adjustments will be made to ensure they are not placed at a disadvantage. In such instances, the 'reasonable adjustment' may be to allow the individual to remain in their current role until a new role that meets their specific needs can be identified.
Marriage and Civil Partnership (employment only)
No MPS employees will be discriminated against with regard to marriage or civil partnership (employment only) as a result of the Detective Rotation Process.
Pregnancy and Maternity

No MPS employees will be discriminated against with regard to their pregnancy or maternity status as a result of the Detective Rotation Process. In line with usual posting practice, consideration will be given to those officers who are pregnant and due to commence maternity leave and such periods of leave will not be counted towards the overall maximum period of 8 years away from TP. The expectation remains that officers who are due to go on maternity leave will not be posted until their return, at which time they will be consulted about their options and future posting opportunities. A police officer does have the right to return to the posting she was in at the start of maternity leave, unless this posting has been changed in accordance with the normal procedures for postings, during the course of their maternity leave. The entitlement to return to her previous posting does not apply if that post was allocated to her during the pregnancy in order to meet health and safety requirements applicable to her regular post. It is also occasionally necessary for duties applicable to a post to be changed. If this occurs during maternity leave, and can be shown to be necessary independently of the absence on maternity leave, she will be required to accept the change.
Race
No MPS employees will be discriminated against with regard to their race as a result of the Detective Rotation Process.
Religion and Belief
No MPS employees will be discriminated against with regard to their religion or beliefs as a result of the Detective Rotation Process.
Sexual Orientation
No MPS employees will be discriminated against with regard to their sexual orientation as a result of the Detective Rotation Process.
Other Issues
No MPS employee will be discriminated against by virtue of their part time status or flexible working patterns. Where officers are identified for transfer under the detective rotation process, they will be required to complete paperwork advising the Workforce Planning Unit of any requirements in relation to part time working, flexible working or personal circumstances that may require either posting to a specific location or a reasonable adjustment. There have been instances whereby officers who work part time have faced some difficulty in securing roles with suitable working patterns at a borough location. In order to mitigate the potential for this occurring again, it is important that all OCUs undertake regular reviews of flexible working patterns to ensure the needs of the organisation are matched with the needs of the individual. Additionally, the expectation remains that both the individual and the OCU are flexible in their approach to ensure that suitable working patterns can be agreed. The Workforce Deployment Unit will work with individuals and OCUs to negotiate transfers, taking

into account personal and welfare considerations: the aim being to maximise flexibility and ensure individuals are posted into roles where they can demonstrate their detective skill and experience to the benefit of all parties.

7. Monitoring – see step 7 of the guidance

a) How will the implementation of the proposal be monitored and by whom?

The Workforce Deployment Unit will monitor the implementation and application of the detective rotation standard operating procedure, to ensure that there are no adverse impacts and if any are identified to recommend and implement changes as necessary. Specifically the Workforce Deployment Unit will monitor the protected characteristics identified above, plus those officers who are part-time and have flexible working patterns and will be subject to detective rotation.

b) How will the results of monitoring be used to develop this proposal and its practices?

A range of data based on the protected characteristics will collated in order to assess the impact of the detective rotation process. This will relate not only to the number of officers who have transferred but also focus on the impact on Territorial Policing in terms of the improving the levels of experience across the Boroughs together with an assessment of the impact of officers who have moved and any reasonable adjustments that have been necessary to ensure there is no adverse impact.

This will allow for a more robust and constructive analysis of the impact and success of the process and will provide meaningful evidence to support either developing further adaptations to the detective rotation process or retaining it in its current format.

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

Basic data will collated on a monthly basis to assess the number of officers who have transferred between the Specialist Business Groups, whilst the more formal monitoring will be conducted on a yearly basis.

Base data to assess the experience levels within TP against the Specialist Business Groups was initially produced in August 2008 and again in August 2010, to allow for an assessment of the impact of rotation on experience levels. This information will continue to be produced and presented to the Detective Career Management Programme Board.

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

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

The Detective Rotation Standard Operating Procedure will be published on People Pages under 'Managing a Vacancy' - along all other information related to police officer postings

Publication will be arranged by the Policy Co-ordination Team within the Strategy and Improvement department.