

SCOTTISH POLICE  
AUTHORITY

Meeting	HR and Remuneration Committee
Date and Time	2 <sup>nd</sup> September 2016
Location	Board Room, Pacific Quay
Title of Paper	Equality Impact Assessments (Organisational Change Consultation - Level 3 Scrutiny)
Item Number	11.2
Presented By	John MacLean/Jackie Kydd
For Approval / For Information –	For Information
Appendix Attached:	Yes

**PURPOSE**

This paper provides a Level 3: Scrutiny Follow Up report outlining progress against the Equality Impact Assessment (EIA) scrutiny that was presented to the HRRC on 22 September 2014.

**BACKGROUND**

Summary of Report

The purpose of the report in 2014 was to determine how to improve the processes supporting EIA's to provide assurance that there is consistency and a level of robustness which gives confidence that the policies, practice and decisions can meet any potential critical challenge.

Since the publication of the report, EIAs now include human rights assessments and are now referred to as EQHRIsAs.

The recommendations focused specifically on:

- the effective provision of training
- improving the process surrounding the review, monitoring and implementation of mitigating actions identified as part of the EQHRIA process; and;
- ensuring EQHRIA's are published within a reasonable timeframe (report recommended four months).

Summary of Progress Against Recommendations

Of the three recommendations all were agreed, one has been fully implemented and two have shown significant progress.

The implementation of an EQHRIA Monitoring Group, with SPA HR Governance representation, is a key development in ensuring that there are internal Police

Scotland governance structures in place to ensure that all recommendations are implemented in the near future.

**RECOMMENDATIONS**

3. The Human Resources and Remuneration Committee Members are asked to note the content of the attached report and to note the involvement of the SPA HR Governance Team within the EQHRIA Monitoring Group to support Police Scotland and seek assurance that all recommendations are fully implemented within a reasonable timescale.

***Scottish Police Authority***  
*HR & Remuneration Committee*

**Equality Impact Assessments  
(Organisational Change)  
- Level 3 Scrutiny**

September  
2016

## INTRODUCTION AND BACKGROUND

The Equality Impact Assessments (EIAs) – Organisational Change Level 2 Scrutiny was presented to the Human Resources and Remuneration Committee (HRRC) on 22 September 2014. This was followed up by Level 3 Scrutiny on 23<sup>rd</sup> October 2015. When presented it was decided that a further update on progress would be provided at a later date to outline further progress.

Since the publication of the report, EIAs now include human rights assessments and are now referred to as EQHRIAs.

### Summary of Report

The purpose of the report in 2014 was to determine how to improve the processes supporting EQHRIA's to provide assurance that there is consistency and a level of robustness which gives confidence that the policies, practice and decisions can meet any potential critical challenge.

The recommendations focused specifically on:

- the effective provision of training
- improving the process surrounding the review, monitoring and implementation of mitigating actions identified as part of the EQHRIA process; and;
- ensuring EQHRIA's are published within a reasonable timeframe (report recommended four months).

## CURRENT STATUS OF RECOMMENDATIONS

**Recommendation 1:** The existing EQHRIA training for SPA and Police Scotland staff to be updated to include reference to, and an explanation of the following areas:

- Purpose of EQHRIA / When is EQHRIA required / not required
- EQHRIA 'completeness' / open / closed EQHRIA
- Requirement for consultation (consultation v information sharing)
- Data gathering methods and analysis
- How to identify high / low/ no impact
- Mitigating Actions
- Objective Justification

<b>Police Scotland Position on Recommendation</b>	Agreed with significant progress made
<b>HR Governance Team – Commentary on Current Status</b>	In terms of the development of guidance, this action is complete. A SOP, supporting guidance and streamlined form have been developed and published. This documentation covers all areas outlined in the recommendation.

	<p>The development of a finalised, formal training course has taken longer than anticipated. The extension of the timescale can be attributed to the decision in 2015 for Police Scotland to become one of the first UK police forces to proactively introduce human rights considerations into existing EQHRIAs – an approach strongly advocated by the Equality &amp; Human Rights Commission (EHRC) and the Scottish Human Rights Commission (SHRC).</p> <p>The SPA have received two separate training sessions that are intended to help pilot and inform the development of the formal EQHRIA training that will be rolled out by the Training Leadership and Development team across SPA and the service.</p> <p>Following both inputs the assessment of the SPA HR Governance Team is that the combination of both inputs meet the requirements of the SPA recommendation, whilst providing a good mix of theoretical knowledge and practical examples. This balance will help ensure the subject can be relevant to all officers and staff irrespective of their role within the organisation.</p> <p>The formalised training is being developed by Training Leadership and Development in consultation with the People and Development Department, Safer Communities, Policy Support and SPA HR Governance Team. In the interim, targeted training is being provided to ensure that those developing policies and procedures have the appropriate support.</p>
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**Recommendation 2:** *It is recommended that the EQHRIA process is reviewed and specifically strengthened in the areas listed below:*

- Requirement for timed mitigating actions;
- Requirement for process to clearly identify and record how/when/where mitigating actions are reviewed; and
- Requirement for mechanism which ensures mitigating actions identified are implemented.

<b>Police Scotland Position on Recommendation</b>	Agreed and complete
<b>HR Governance Team – Commentary on Current Status</b>	<p>All supporting documentation and the interim training places great emphasis on the need to ensure that timescales are placed on mitigating actions and that responsibility should be taken to monitor progress to ensure the mitigating action is carried out within a reasonable timescale.</p> <p>This has been supported with the development of a Corporate</p>

	<p>EQHRIA Monitoring Group, which has the responsibility for having oversight of the progress and implementation of mitigating actions across the service. Responsibility for mitigating actions rests with the owning department. However, it is hoped that through dip sampling and engagement with key business areas, assurance can be provided to Police Scotland and SPA that owning departments are appropriately identifying mitigating actions and taking responsibility for implementing these within a reasonable timescale.</p> <p>This Group is chaired by the Superintendent within Safer Communities and has representation from People and Development, Policy Support, Safer Communities and the SPA HR Governance Team.</p> <p>Progress from this Group will be reported to the Equality and Diversity Strategic Governance Group, chaired by the DCC Designate, and the relevant sub groups which cover People and Development and Service Delivery.</p>
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**Recommendation 3:** It is recommended that Police Scotland publishes EQHRIA's within four months of organisational change project completion date.

<b>Police Scotland Position on Recommendation</b>	Agreed with significant progress made.
<b>HR Governance Team – Commentary on Current Status</b>	<p>This recommendation initially focused on Organisational Change, however the focus has extended to Standards Operating Procedures.</p> <p><u>Organisational Change</u></p> <p>It has been confirmed that EQHRIAs, which assess the impact of staff in relation to Organisational Change are published internally on the Intranet with the purpose of demonstrating to staff that employee impact has been assessed.</p> <p>With regards to the proposal to consider an overarching publication summary in relation to organisational change as a whole, the SPA HR Governance team believe that this suggestion will be met by ensuring that the EQHRIA summary documents relating to Organisational Change Policy/SOPs are published externally. This will ensure a public demonstration that the consistent processes used to by People and Development to support the HR implications of organisational change have been EQHRIA'd.</p> <p>With regards to the publication of EQHRIAs in relation to Community Impact there is currently a plan in place to ensure that an EQHRIA Summary document is published on the internet for each piece of organisational change that is</p>

implemented and has an impact on the community.

### SOPs

Police Scotland has 240 SOPs, all of which have an EQHRIA. Out of the 240, 161 (67%) have a summary of results for these EQHRIA's published on the Police Scotland Internet site. An additional 36 SOPs (15%) are currently under review and a summary of results will be published for these shortly after the updates to these SOPs are published. For those results not published or under review, Policy Support and People and Development are putting in place an action plan to address this issue.

### Overall Governance of the Publication Process

As mentioned within the status update at recommendation 2, a Corporate EQHRIA Monitoring Group has been set up. A key responsibility of this group is to monitor progress of the publication process for both Organisational Change and SOPs.

There is perhaps a wider question as to whether there is an effective process in place to identify when an EQHRIA is required and when it is not, with the current approach being that all require an EQHIRA. However this issue will be considered further once sufficient progress has been made with regards to the publication of current EQHRIA summary results.