

Stage 1 Equality Impact Assessment – Initial Screening

Assessor(s) Name(s):	Paul Littler
Directorate:	Resources
Date of Completion:	21 February 2012

Name of Policy/Strategy/Service/Function Proposal

Safer Recruitment Policy

The Aims, Objectives and Expected Outcomes:

The policy will ensure that safer recruitment activity is considered when recruiting staff within the Isle of Wight Council.

The aim of the policy is to ensure that there is consistent good practice across all council services. The expected outcome is improved safer recruitment that ensures that the council is fully compliant with legislation. This will reduce the risks of making an inappropriate appointment.

Please delete as appropriate:

This is a new policy

Key Questions to Consider in Assessing Potential Impact	
Will the policy, strategy, service or council function proposal have a negative impact on any of the protected characteristics or other reasons that are relevant issues for the local community and/or staff?	Yes/No
Has previous consultation identified this issue as important or highlighted negative impact and/or we have created a “legitimate expectation” for consultation to take place? A legitimate expectation may be created when we have consulted on similar issues in the past or if we have ever given an indication that we would consult in such situations	Yes/No
Do different groups of people within the local community have different needs or experiences in the area this issue relates to?	Yes/No
Could the aims of these proposals be in conflict with the council’s general duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not?	Yes/No
Will the proposal have a significant effect on how services or a council function/s is/are delivered?	Yes/No
Will the proposal have a significant effect on how other organisations operate?	Yes/No
Does the proposal involve a significant commitment of resources?	Yes/No
Does the proposal relate to an area where there are known inequalities?	Yes/No
<p>If you answer Yes to any of these questions, it will be necessary for you to proceed to a full Equality Impact Assessment after you have completed the rest of this initial screening form.</p> <p>If you answer No to all of these questions, please provide appropriate evidence using the table below and complete the evidence considerations box and obtain sign off from your Head of Service.</p>	

Protected Characteristics	Positive	Negative	No impact	Reasons
Age	x			All of the protected characteristics are fully identified throughout the policy as warranting equal consideration when making appointment decisions. The age profile of the council is predominantly 35 and over, with a much lower percentage of younger workers. The policy refers managers towards further HR advice if any questions about age considerations need to be addressed.
Disability	x			Disability is given a greater emphasis in the policy due to the council's commitment to the 'double tick' standard, a requirement to interview all disabled candidates who meet the minimum recruitment criteria. Whilst the majority of council staff (89.2%) have declared that they don't have a disability, to reflect the island community more equitably the council adopts the 'double tick' approach to all recruitment decisions.
Gender Reassignment	x			Gender reassignment data is very limited, both within the council and within the community. The policy sets our clear guidelines that state that people undergoing Gender Reassignment, or have undergone Gender Reassignment, must be treated equally to all other applicants.
Marriage & Civil Partnership	x			The policy explicitly states that married and civil partnered staff are not deselected or treated differently than other applicants. The proportion of council staff who are married is just over 50%, and a further 0.7% are in a civil partnership.
Pregnancy & Maternity	x			The age group of women who are considered to be most economically active, and therefore active in the labour market, are also statistically most likely to be within the age group on the Island who are having children (ages 24 to 35) (data extracted from Office of National Statistics). It is essential therefore that the council adopts a standard approach for recruitment that prevents decisions being made that restrict access to opportunity for pregnant women or women on maternity leave.
Race	x			The island community has a lower proportion of people

				from ethnic groups than in the region as a whole according to comparative data. The council staff population reflects this trend with numbers being declared at only around 0.9% of the entire staff group. Again the policy provides support to managers that would allow them to make informed recruitment decisions to improve the diversity make up of their teams.
Religion / Belief	x			The policy ensures that religion and belief (or not having a religion or belief) should not form part of discriminatory practices when making recruitment decisions. Whilst the majority of staff have not declared having any religious belief, the fact that nearly 33% have and are in the majority Christians it is important that managers are conscious of making lawful recruitment decisions without bias towards one faith or no faith over another.
Sex (male / female)	x			The island has a small predominance of women over men, which increases in the council workplace. The policy ensures that managers make decisions based upon merit and the meeting of essential requirements.
Sexual Orientation	x			Information on sexual orientation is limited, but the council maintains an explicit statement (as with all of the 9 protected characteristics) that all applicants must be treated equally. Current data suggests that less than 2% of staff have stated that they are homosexual or bisexual, which is considerably lower than Office for National Statistics estimates of between 6 to 10% of the population.

Are there aspects of the proposal that contribute to or improve the opportunity for equality?	Yes
<i>If answered Yes, describe what these are and how they may be promoted or enhanced</i>	
<p>The policy actively identifies positive approaches to considering the nine protected characteristics when making recruitment decisions and clearly prohibits discriminatory practice. Positive Action guidelines allow managers to make recruitment decisions that improve the diversity of their teams if choosing between two equally high scoring applicants. This forms just one part of the overarching strategy to ensure that that the council consistently applies fair and equitable safer recruitment decisions.</p>	

Evidence Considered During Screening

Data came from the Office of National Statistics (ONS) as well as from confidential information provided as part of the 2011 staff survey and staff data collected as part of the recruitment processes.

Further consultation took place with the 'Equals' group on the island, who offered their comments regarding the policy.

The policy was also widely circulated amongst management teams including legal services and was formally signed off by the Deputy Director of Resources (Corporate Governance and Monitoring Officer).

Head of Service Sign off:	
Advice sought from Legal Services (Name)	Kate Hill
Date	

A signed version is to be kept by your team and also an electronic version should be published on the council's website (follow the link from the EIA page on the intranet)

Stage 2 Full Equality Impact Assessment

Assessor(s)Name(s):	Paul Littler
Directorate:	Resources
Date of Completion:	21 February 2012

Name of Policy/Strategy/Service/Function Proposal

Safer Recruitment Policy

The Aims, Objectives and Expected Outcomes:

Using the information provided in your initial screening, write a brief description of your policy, strategy, service or council function under assessment. It is important to focus on the reasons for a new or changed approach and what it intends to achieve. Include who the main beneficiaries or users are and the main groups of people with protected characteristics who are affected. State how this proposal fits with the council's corporate priorities.

The policy will ensure that safer recruitment activity is considered when recruiting staff within the Isle of Wight Council.

The aim of the policy is to ensure that there is consistent good practice across all council services. The expected outcome is improved safer recruitment that ensures that the council is fully compliant with legislation. This will reduce the risks of making an inappropriate appointment.

Please delete as appropriate:

- This is a new policy

Scope of the Equality Impact Assessment

Include any links to a previous equality impact assessment or work delivered by another Directorate/service or partner organisation. Describe the approach to be taken in data collection, stakeholder involvement and state who the stakeholders are.

Establish your monitoring and review arrangements.

Sources of evidence may include:

- *Service monitoring reports including equality monitoring data*
- *User feedback*
- *Population data – IW Facts and Figures (add link)*
- *Complaints data*
- *Published research, local or national*
- *Feedback from consultations and focus groups*
- *Feedback from individuals or organisations, other council departments, partner organisations etc*

Set out any data gaps that may need to be addressed and how you plan to address them and include in your action plan.

Our stakeholders are all potential applicants for vacancies. These include staff inside the council. The stakeholder group therefore is very diverse and scattered, and would include potential international applicants. This has been considered throughout the development of the policy and the policy explicitly enshrines equality of opportunity throughout.

The ‘Equals’ group reviewed the policy to offer constructive feedback on areas of weakness they perceived in addressing issues associated with the 9 protected characteristics. The policy was circulated by the group lead, and they thought “it covered most of issues about Diversity and 9 protected characteristics (Niviera Piper, Equals Group).

Island diversity statistics highlight that the island has a significantly higher proportion of older people (men aged 65+ and women 60+) than the rest of England and Wales (28.2% compared with 19.6% nationally. ONS. 2010). The policy therefore asserts that managers undertaking recruitment consider the needs of the labour market, and make adjustments to respond to needs as necessary.

Throughout the policy managers are reminded that all recruitment must be undertaken with equal consideration of those with and without protected characteristics. This may mean considering applying ‘Positive Action’ that allows managers to decide to choose between two equally scoring candidates that would improve the diversity of their team. This will be mostly evident when considering men or women (there is slight imbalance across the Island population of women over men, but this isn’t significantly different than that found across the UK as a whole (ONS. 2010)). The council’s current staff are made up of around 65% women.

Positive Action may also be applied when considering minority applicants as the island generally has a lower number of ethnic minorities from some ethnic groups. Increases have been seen amongst Asian, Black and White Other ethnic groups (ONS. 2009) across the Island, but numbers are still proportionately lower than those found in the South East Region (White British majority represents 91.73% of the Island population compared to 82.79% for England and 85.72% for the South east region (ONS. 2009)). The council only employs 2.5% of staff who identify their ethnicity as other than White UK.

People who have declared a disability will already have been integrated into the short listing

process of recruitment as a result of the council's '2 tick' commitment to disabled applicants who meet the essential requirements of the person specification. Managers may still apply 'Positive Action', and additional guidelines exist to support this. It is worth considering that 6.2% of staff declared that they had a disability, of which 62% was physical. The policy and the revised letter inviting people to interview explicitly states the need to consider the access requirements of potential applicants when planning interviews.

More difficult to quantify locally are the statistics to support gender reassignment status and sexual orientation. There are no official sources of equality information on gender reassignment status, and the information on sexual orientation from ONS is sketchy. The difficulty for recruiting managers is that sexual orientation and gender reassignment status may not be evident and the policy therefore sets out clear guidelines to ensure that managers adopt an equal approach to all recruitment. Staff data suggests that only 1.8% of staff identify themselves as either homosexual or bisexual, which is somewhat lower than national estimates of between 6 and 10% of the population (ONS census data 2001).

Recruiting managers are also made aware of the need to be conscious of the needs of pregnant women and women who are on maternity leave, as data suggests that a high number of births occur to women aged between 20 and 34 (DoH. 2010) who form the most economically active group of women on the Island (ONS. 2010), and therefore the group most likely to be actively looking for work.

Religion and belief (or not having a religion or belief) is again a largely hidden characteristic, but the policy asserts the need to treat all people equally. Whilst 61% of staff have stated that they have no religion or belief, there remains 32.9% (some staff avoided answering the question) of council staff who do have beliefs, the majority of which are Christian.

Finally managers are also advised to be conscious of making no discriminatory recruitment decisions based on marital or civil partnership status. Just over 51% of council staff stated that they are married, with a further .7% in a civil partnership.

Analysis and assessment

Given the available information, what is the actual or likely impact on minority, disadvantaged, vulnerable and socially excluded groups? Is this impact positive or negative or a mixture of both? In particular set out how the council as a public body has met its duty to pay regard to eliminate unlawful discrimination, harassment and victimisation and advance the equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not.

Detail what concerns were identified during any consultation exercises together with any positive impact that has been identified and how this can be promoted or enhanced. Are there any concerns

from consultation and data gathering that have not been taken on board, if so, please justify and explain the reason for this.

Does the proposal have the potential to cause unlawful discrimination (for example is it possible that the proposal may exclude certain groups of people from obtaining services or limit their participation in any aspect of public life?)

Set out in light of the consultation and data gathering what changes, if any you will make to the proposal

What can be done to reduce the effects of any negative impacts? Where negative impact cannot be completely diminished, can this be justified and is it lawful?

The policy objectives are to have a positive effect on all candidates applying for a position within the council. The policy clearly identifies safer recruitment practices that pay regard to respecting the different needs of candidates, and making equal opportunities explicit at all stages of the recruitment process.

The policy signposts managers to the 'Positive Action' guidelines that refer to the requirement within the Equality Act 2010 for public sector bodies to consider appointing a person with a protected characteristic (if known) to a position to improve the diversity makeup of a team. The available data clearly indicates that the council faces challenges in providing equality of access to vacancies for both the community and its current employees. The policy adopts a strategic position whereby managers must establish an equal route of access for all applicants for all vacancies, and if they choose to adopt 'Positive Action', that they do so from an informed position.

The policy also refers managers to further guidance from the HR Advisors within the council when there is any ambiguity or question that a recruitment matter in any way may appear to favour (or disadvantage) any potential applicants.

Access to staffing data, as well as up to date information about the make up of the 9 protected characteristics within the island community, has helped to inform the scope of the policy. With this knowledge it is evident that the policy provides a positive approach to safer recruitment within the council, and references to adopting an equal standard in the consideration of applicants and throughout the recruitment process is at the heart of 'good practice' decision making.

There are no recognised negative impacts associated with the policy.

Recommendations

Please summarise the main recommendations arising from the assessment. If it is not possible to diminish negative impacts to an acceptable or even a lawful level the recommendation should be that the proposal or the relevant part of it should not proceed.

There are no recognised negative impacts arising from this assessment.

Action/Improvement Plan

The table below should be completed using the information from your equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Remove or lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age	Positive	There will be no adverse impact	n/a	n/a
Disability	Positive	There will be no adverse impact	n/a	n/a
Gender Reassignment	Positive	There will be no adverse impact	n/a	n/a
Marriage & Civil Partnership	Positive	There will be no adverse impact	n/a	n/a
Pregnancy & Maternity	Positive	There will be no adverse impact	n/a	n/a
Race	Positive	There will be no adverse impact	n/a	n/a
Religion / Belief	Positive	There will be no adverse impact	n/a	n/a
Sex (male or female)	Positive	There will be no adverse impact	n/a	n/a

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Sexual Orientation	Positive	There will be no adverse impact	n/a	n/a
HR & workforce issues	Positive	There will be no adverse impact	n/a	n/a
Human Rights implications if relevant	n/a	n/a	n/a	n/a
Please remember - actions should have SMART targets and be reported to the Diversity Board (this should be done via your Directorate representative) and incorporated into your service/team Plans and /or objectives of key staff				

Summary	
Date of Assessment:	
Signed off by Head of Service/Director	
Review date	
Date published	

Publishing checklist	Yes	No
<ul style="list-style-type: none"> • <i>Plain English – will your EIA make sense to the public?</i> • <i>Acronyms – check you have explained any specialist names or terminology</i> • <i>Evidence – will your evidence stand up to scrutiny; can you justify your conclusions?</i> • <i>Stakeholders and verification – have you included a range of views and perspectives to back up you analysis?</i> • <i>Gaps and information – have you identified any gaps in services or information that need to be addressed in the action plan?</i> • <i>Success stories – have you included any positive impacts that have resulted in change for the better?</i> • <i>Action plan – is action plan SMART? Have you informed the relevant people to ensure the action plan is carried out?</i> • <i>Review have you included a review date and a named person to carry it out?</i> • <i>Challenge – has your equality impact assessment been taken to Diversity Board/Call Over for challenge?</i> • <i>Signing off – has your Head of Service/Director signed off your EIA?</i> • <i>Basics – have you signed and dated your EIA and named it for publishing?</i> • <i>A signed version to be kept by your team for review and electronic version to be uploaded on to the council’s website</i> 		