



Date: 09/08/2024
Our ref: 01/FOI/24/012942/S

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/24/012942/S

I write in connection with your request for information dated 16/07/2024, received by Greater Manchester Police (GMP) for the following information:

What Equality Impact Assessments have been made in the last 5 years in relation to policy or process for promotion boards within GMP. Please supply copies.

Who sits on a the reasonable adjustment panel and what qualifications are required for the panel members to hold to make reasonable adjustment decisions.

Result of Searches

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate information relevant to your request. I can confirm that the information you have requested is held by GMP. However, I am not obliged to supply you with all the information as an exemption applies.

Section 17 of the Freedom of Information Act 2000 requires Greater Manchester Police, when refusing to provide such information (because this information is exempt) to provide you, the applicant, with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies. Where redactions occur in the attached documents, it is because that is exempt from disclosure by virtue of the following exemption: **Section 40(2) – Personal Information.**

Where Section 40 has been used, this represents information that identifies a living individual, to disclose this information would breach the principles of the GDPR and the Data Protection Act 2018. Personal data is defined by Article 4 of the GDPR and Part 1 of the Data Protection Act 2018 and means any information relating to an identified or identifiable natural person ('data subject'). An identified natural person is one who can be identified directly or indirectly from that data.

In accordance with the Section 17 of the Freedom of Information Act 2000, this letter acts as a Refusal Notice for those specific pieces of information.

1. Please find redacted copies of the Equality Impact Assessment (EIA) Policy for Police Officer promotions, and the statistical breakdown. The data is from 2017 to present day. A score of less than 0.8 shows there is adverse impact to the minority group compared to the larger group.
2. The Reasonable Adjustment (RA) panel comprises the Organisational Development Team Leader, Promotions' Development Officer, and a Workforce Development Officer. Both the Team Leader and Promotions' Development officer are Chartered Institute of Personnel and Development graduates with extensive experience in all areas of Human Resources. The Workforce Development Officers have attended Open University Courses (Understanding ADHD and Exploring Learnings disabilities), College Of Policing Equality Act 2020 online learning, exploring Women's Health (menopause), Diversity and Inclusion, Work and Mental Health, Understanding Autism, Barnardo's Shine+ Programme (specifically neurodiversity). Staff are not mandated to attend any course or specific training, but ensure they have a wider understanding of conditions and disabilities. The purpose of the RA panel within promotions is to use the professional evidence submitted and consider adjustments within the promotion processes and examinations that are *reasonable* and can be incorporated into the process/exam.



GREATER MANCHESTER
POLICE

Equality Impact Assessment

Strategy, Policy & Procedure

Greater Manchester Police
2023

Equality Impact Assessment (EIA) for Strategies, Policies and Procedures

Before completing this form, please refer to the supporting guidance documents *[TO BE LINKED ONCE COMPLETED]*.

All public bodies, including the Chief Constable have a legal duty under the Equality Act 2010 (called the 'Public Sector Equality Duty' or 'PSED') to have due regard when exercising their functions of the need to eliminate discrimination, harassment, victimisation and other prohibited conduct, advance equality of opportunity, and foster good relations between persons who share a relevant protected characteristic and those who do not.

The aim of an equality impact assessment (EIA) (or an updated EIA) is to enable the consideration of the equality implications of your strategy, policy or procedure on those groups detailed below, to consider if there are ways to proactively advance equality and consider how adverse risks could be eliminated. The EIA must be completed regardless of whether the policy may appear neutral in its effect.

1. EIA Version Control			
Version no.	Date	Author	Comments
1.0	29/01/24		

2. Policy Details	
Name of the strategy, policy or procedure being assessed, and a brief overview of its aims and objectives	Promotion Selection for Police Officers Policy and Procedures v.4.0
Is it new or existing?	Revised
Policy owner (role, branch/district)	, Promotion Development Officer, Workforce Development Unit, Strategic Resourcing Branch
EIA carried out by (role, branch/district)	As Above
Date of completion	29/01/2024

3. Evidence Gathering and Engagement

a. What **evidence** has been used for this assessment? For example, national statistics, demographic data, research statistics

Adverse Impact data gathered across all force internal promotion process from 2017 to 2023. Data gathered includes ethnicity, gender, disability, sexuality and policing background i.e. operational vs non-operational.

b. Who have you **engaged and consulted with** as part of your assessment? For example, community groups, Independent Advisory Groups, staff associations/networks

Disability support network, Police Federation, Association of Women in Policing

4. Impact on different groups of the public and/or officers and staff

Specific groups to consider ¹	Potential impact on this group and actions taken to mitigate impact and advance equality, diversity and inclusion
Age People of different ages	No impact identified.
Disability Disabled people, including those with mental health issues.	Potential impact for people with neurodiverse conditions, physical disabilities and mental health issues is mitigated by the Reasonable Adjustment and Accommodations process. Quality Assurance officers in all interview/assessment panels for any officer declaring a disability.
Gender reassignment Trans and non-binary people	Potential impact of unconscious bias from assessment panels, mitigated by pre-process training and briefing in understanding unconscious bias. Quality Assurance officers in interview/assessment panels to observe assessors.
Marriage and civil partnership A person has the protected characteristic of marriage and civil partnership if the person is married or is a civil partner.	No impact identified.

¹ All of the terms in bold is the terminology used in the [Equality Act 2010](#).

Pregnancy and maternity	Potential impact of recency of evidence provided in interviews (maternity leave). Mitigated by removing any time limits to evidence, training assessors and Quality Assurance Officers observing.
Race People from minority ethnic backgrounds and communities	Potential impact for language and cultural differences. Steps to mitigate this include all documentation for promotion process to be in plain English, no points deducted for mis-spellings or grammatical errors in written work. Adverse impact monitored throughout promotion processes. Quality Assurance officers in all interview/assessment panels for any officer from a minority ethnic background. Specific online workshops offered to minority ethnic candidate prior to promotion processes.
Religion or belief People with different religions and/or beliefs	Potential impact for those observing religious rules pertaining to food and nourishment, for example Ramadan, in being tired and unable to fully function. Mitigation for this is ensuring promotion processes are avoided during religious periods or officers are provided with alternative dated when possible.
Sex Both men and women	No adverse impact identified. However, additional support offered by Association of Women in Policing to all female officers.
Sexual orientation LGBTQ+ people	Potential impact of unconscious bias from assessment panels, mitigated by pre-process training and briefing in understanding unconscious bias. Quality Assurance officers in interview/assessment panels to observe assessors.
Other groups Not defined as protected characteristics, but who may be impacted by your policy (e.g., travelling/gypsy community, ex-armed forces, people from lower socio-economic backgrounds, carers etc.)	

5. Action Planning

Complete this section if the EIA has identified additional steps that need to be taken to address adverse outcomes for particular groups (either by way of eliminating or minimising this risk), or to collect additional evidence to inform the EIA.

Issue Identified	Planned Action	Lead and Timeframe

6. Outcome of EIA

An EIA has been undertaken on this policy as part of the requirements under the PSED. The policy will be submitted to Chief Officers on the following basis (please tick one box):

	Approve – no change	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.
	Amend the policy	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect. This should be done before the policy is implemented. Where this cannot happen the action plan must outline how you are going to achieve this
	Continue with the policy	This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate. In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.
	Stop and remove the policy	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

7. Monitoring and Review

How will you monitor the impact of your policy/process once it has been put into effect?

Sign off from Head of Department or Service:

Review Date (must match next review date of the policy):



Statistics & Adverse Impact Rank Breakdown

Sergeant

Group			Number	% of all Applied	Group			No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total
Ethnicity	Ethnically Diverse Groups	Non	289	10%	Ethnicity	Ethnically Diverse Groups	Non	145	50%	5%	0.88	144	50%	5%	289
	Ethnically Diverse Groups	Prefer Not To Disclose	2515	88%		Ethnically Diverse Groups	Prefer Not To Disclose	1430	57%	50%		1085	43%	38%	2515
			65	2%				33	51%	1%		32	49%	1%	65
Total					Total			1608		56%		1261		44%	2869
Gender	Female	Male	830	29%	Gender	Female	Male	527	63%	18%	1.20	303	37%	11%	830
	Female	Male	2024	71%		Female	Male	1071	53%	37%		953	47%	33%	2024
			15	1%				10	67%	0%		5	33%	0%	15
Total					Total			1608		56%		1261		44%	2869
Role	Detective	Uniform	1126	39%	Role	Detective	Uniform	678	60%	24%	1.13	448	40%	16%	1126
	Detective	Uniform	1707	59%		Detective	Uniform	913	53%	32%		794	47%	28%	1707
			36	1%				17	47%	1%		19	53%	1%	36
Total					Total			1608		56%		1261		44%	2869
Disability	Disability Declared	No Disability	277	10%	Disability	Disability Declared	No Disability	166	60%	6%	1.08	111	40%	4%	277
	Disability Declared	No Disability	2480	86%		Disability Declared	No Disability	1381	56%	48%		1099	44%	38%	2480
			112	4%				61	54%	2%		51	46%	2%	112
Total					Total			1608		56%		1261		44%	2869
Sexuality	LGBT	Non LGBT	226	8%	Sexuality	LGBT	Non LGBT	121	54%	4%	0.94	105	46%	4%	226
	LGBT	Non LGBT	2332	81%		LGBT	Non LGBT	1334	57%	46%		998	43%	35%	2332
			311	11%				153	49%	5%		158	51%	6%	311
Total No. of Candidates			2869		Total			1608		56%		1261		44%	2869

Inspector

Group			Number	% of all Applied	Group			No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total
Ethnicity	Ethnically Diverse Groups	Non	51	5%	Ethnicity	Ethnically Diverse Groups	Non	26	51%	3%	0.97	25	49%	3%	51
	Ethnically Diverse Groups	Prefer Not To Disclose	848	91%		Ethnically Diverse Groups	Prefer Not To Disclose	444	52%	48%		404	48%	43%	848
			32	3%				18	56%	2%		14	44%	2%	32
Total					Total			488		52%		443		48%	931
Gender	Female	Male	215	23%	Gender	Female	Male	135	63%	15%	1.27	80	37%	9%	215
	Female	Male	709	76%		Female	Male	350	49%	38%		359	51%	39%	709
			7	1%				3	43%	0%		4	57%	0%	7
Total					Total			488		52%		443		48%	931
Role	Detective	Uniform	416	45%	Role	Detective	Uniform	252	61%	27%	1.34	164	39%	18%	416
	Detective	Uniform	476	51%		Detective	Uniform	215	45%	23%		261	55%	28%	476
			39	4%				21	54%	2%		18	46%	2%	39
Total					Total			488		52%		443		48%	931
Disability	Disability Declared	No Disability	106	11%	Disability	Disability Declared	No Disability	56	53%	6%	1.00	50	47%	5%	106
	Disability Declared	No Disability	801	86%		Disability Declared	No Disability	423	53%	45%		378	47%	41%	801
			24	3%				9	38%	1%		15	63%	2%	24
Total					Total			488		52%		443		48%	931
Sexuality	LGBT	Non LGBT	57	6%	Sexuality	LGBT	Non LGBT	32	56%	3%	1.06	25	44%	3%	57
	LGBT	Non LGBT	794	85%		LGBT	Non LGBT	422	53%	45%		372	47%	40%	794
			80	9%				34	43%	4%		46	58%	5%	80
Total No. of Candidates			931		Total			488		52%		443		48%	931

Chief Inspector

Group			Number	% of all Applied	Group			No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total
Ethnicity	Ethnically Diverse Groups	Non	30	8%	Ethnicity	Ethnically Diverse Groups	Non	16	53%	4%	1.00	14	47%	4%	30
	Ethnically Diverse Groups	Prefer Not To Disclose	366	92%		Ethnically Diverse Groups	Prefer Not To Disclose	196	54%	49%		170	46%	43%	366

	Prefer Not To Disclose	4	1%		Prefer Not To Disclose	2	50%	1%		2	50%	1%	4
	Total	214			Total	214				186			400
Gender	Female	113	28%		Female	74	65%	19%	1.35	39	35%	10%	113
	Male	286	72%		Male	139	49%	35%		147	51%	37%	286
	Prefer Not To Disclose	1	0%		Prefer Not To Disclose	1	#DIV/0!	#DIV/0!		0	0%	0%	1
	Total	214			Total	214				186			400
Role	Detective	187	47%		Detective	116	62%	29%	1.33	71	38%	18%	187
	Uniform	210	53%		Uniform	98	47%	25%		112	53%	25%	210
	Prefer Not To Disclose	3	1%		Prefer Not To Disclose	0	0%	0%		3	100%	0%	3
	Total	214			Total	214				186			400
Disability	Disability Declared	46	12%		Disability Declared	23	50%	6%	0.92	23	50%	6%	46
	No Disability	339	85%		No Disability	184	54%	46%		155	46%	39%	339
	Prefer Not To Disclose	15	4%		Prefer Not To Disclose	7	47%	2%		8	53%	2%	15
	Total	214			Total	214				186			400
Sexuality	LGBT	27	7%		LGBT	12	44%	3%	0.84	15	56%	4%	27
	Non LGBT	358	90%		Non LGBT	190	53%	48%		168	47%	42%	358
	Prefer Not To Disclose	15	4%		Prefer Not To Disclose	12	80%	3%		3	20%	1%	15
	Total	214			Total	214				186			400
Total No. of Candidates				400									

Superintendent

Group			Number	% of all Applied	Group			No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total
Ethnicity	Ethnically Diverse Groups	19	8%	Ethnicity	Ethnically Diverse Groups	8	42%	3%	1.23		11	58%	5%	19	
	Non Ethnically Diverse Groups	219	91%		Non Ethnically Diverse Groups	75	34%	31%			144	66%	60%	219	
	Prefer Not To Disclose	2	1%		Prefer Not To Disclose	1	50%	0%			1	50%	0%	2	
	Total				84		35%			156		65%	240		
Gender	Female	60	25%	Gender	Female	25	42%	10%	1.26		35	58%	15%	60	
	Male	179	75%		Male	59	33%	25%			120	67%	50%	179	
	Prefer Not To Disclose	1	0%		Prefer Not To Disclose	0	0%	0%			1	100%	0%	1	
	Total				84		35%			156		65%	240		
Role	Detective	107	45%	Role	Detective	45	42%	19%	1.34		62	58%	26%	107	
	Uniform	124	52%		Uniform	39	31%	16%			85	69%	35%	124	
	Prefer Not To Disclose	9	4%		Prefer Not To Disclose	0	0%	0%			9	100%	0%	9	
	Total				84		35%			156		61%	240		
Disability	Disability Declared	15	6%	Disability	Disability Declared	6	40%	3%	1.13		9	60%	4%	15	
	No Disability	215	90%		No Disability	76	35%	32%			139	65%	58%	215	
	Prefer Not To Disclose	10	4%		Prefer Not To Disclose	2	20%	1%			8	80%	3%	10	
	Total				84		35%			156		65%	240		
Sexuality	LGBT			Sexuality	LGBT			0.84							
	Non LGBT				Non LGBT										
	Prefer Not To Disclose				Prefer Not To Disclose										
	Total No. of Candidates				240	84				35%		156		65%	240

Chief Superintendent

Group		Number	% of all Applied	Group		No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total
Ethnicity	Ethnically Diverse Groups	[REDACTED]	[REDACTED]	Ethnically Diverse Groups	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0.69	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Non Ethnically Diverse Groups												
	Ethnically Diverse Groups												
	Prefer Not To Disclose												
				Total	17		47%		19		53%	36	
Gender	Female	12	33%	Female	7	58%	19%	1.40	5	42%	14%	12	
	Male	24	67%	Male	10	42%	28%		14	58%	39%	24	
	Prefer Not To Disclose	0	0%	Prefer Not To Disclose	0	#DIV/0!	#DIV/0!		0	#DIV/0!	0%	0	
					Total	17			47%		19		53%
Role	Detective	[REDACTED]	[REDACTED]	Detective	[REDACTED]	[REDACTED]	[REDACTED]	1.59	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Uniform												
	Prefer Not To Disclose												

Disability	Disability Declared		Total	17	47%	1.03	19	39%	36
	No Disability		Disability Declared						
	Prefer Not To Disclose		No Disability						
			Prefer Not To Disclose						
Sexuality	LGBT		Total	17	47%	0.00	19	53%	36
	Non LGBT		LGBT						
	Prefer Not To Disclose		Non LGBT						
			Prefer Not To Disclose						
Total No. of Candidates		36	Total	17	47%		19	53%	36

All Processes

Group	Number	% of all Applied	Group	No. Successful	% of Group	% of all Applied	Adverse Impact? (<0.8)	No. Unsuccessful	% of Group	% of all Applied	Total		
Ethnicity	Ethnically Diverse Groups	392	9%	Ethnicity	Ethnically Diverse Groups	196	50%	4%	0.92	196	50%	4%	392
	Non Ethnically Diverse Groups	3981	89%		Non Ethnically Diverse Groups	2161	54%	48%		1820	46%	41%	3981
	Prefer Not To Disclose	103	2%		Prefer Not To Disclose	54	52%	1%		49	48%	1%	103
					Total	2411		54%		2065		46%	4476
Gender	Female	1230	27%	Gender	Female	768	62%	17%	1.23	462	38%	10%	1230
	Male	3222	72%		Male	1629	51%	36%		1593	49%	36%	3222
	Prefer Not To Disclose	24	1%		Prefer Not To Disclose	14	58%	0%		10	42%	0%	24
					Total	2411		54%		2065		46%	4476
Detective	Detective	1847	41%	Detective	Detective	1098	59%	25%	1.19	749	41%	17%	1847
	Uniform	2542	57%		Uniform	1275	50%	28%		1267	50%	28%	2542
	Prefer Not To Disclose	87	2%		Prefer Not To Disclose	38	44%	1%		49	56%	1%	87
					Total	2411		54%		2065		46%	4476
Disability	Disability Declared	446	10%	Disability	Disability Declared	252	57%	6%	1.05	194	43%	4%	446
	No Disability	3868	86%		No Disability	2080	54%	46%		1788	46%	40%	3868
	Prefer Not To Disclose	162	4%		Prefer Not To Disclose	79	49%	2%		83	51%	2%	162
					Total	2411		54%		2065		46%	4476
Sexuality	LGBT	321	7%	Sexuality	LGBT	168	52%	4%	0.96	153	48%	3%	321
	Non LGBT	3738	84%		Non LGBT	2041	55%	46%		1697	45%	38%	3738
	Prefer Not To Disclose	417	9%		Prefer Not To Disclose	202	48%	5%		215	52%	5%	417
	Total No. of Candidates	4476			Total	2411		54%		2065		46%	4476