



Date: 21/10/2024
Our ref: 01/FOI/24/013342/E

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/24/013342/E

I write in connection with your request for information dated 30/10/2024, received by Greater Manchester Police (GMP) for the following information:

In relation to your document Diversity and Equality in Employment Policy, please can you supply a copy of the associated Equality Impact Assessment.

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 of 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. The information you have requested is exempt from disclosure by virtue of the following exemption: **Section 40(2) – Personal Information.**

Where redactions occur in the attached Equality Impact Assessment document, 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 particular pieces of information.

The rest of the Equality Impact Assessment is not exempt and can be found attached.



GREATER MANCHESTER
POLICE

Equality Impact Assessment

Strategy, Policy & Procedure

Greater Manchester Police
2024

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

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	March 2024	Strategic Policy and People Relations Team	EIA for revised and updated policy

2. Policy Details	
Name of the strategy, policy or procedure being assessed, and a brief overview of its aims and objectives	Diversity, Equality and Inclusion in Employment Policy. The policy sets out our commitment to diversity, equality and inclusion in all areas of employment. It explains which policies can be used if there has been a breach of the policy.
Is it new or existing?	Existing
Policy owner (role, branch/district)	
EIA carried out by (role, branch/district)	
Date of completion	6 th March 2024

3. Evidence Gathering and Engagement
a. What evidence has been used for this assessment? For example, national statistics, demographic data, research statistics CIPD and Xpert HR: best practice has now been updated due to outcomes of tribunals and effective application of legislation within various organisations. Best practice promotes proactivity, ensuring that the policy is visible and used. There is also an expectation that inclusion be included,

not just diversity and equality. There is no hierarchy of protected characteristics. There needs to be an expansion of the term 'belief' so that this is clearer. Information about age needs to be clearer, especially regarding positive action. Information about banter needed and the responsibilities of all staff to report discrimination. More detail about conflicting views and how to deal with these situations.

NPCC and College of Policing: terminology changes regarding gender reassignment; information included about supporting neurodiversity; more supportive approach to disability, e.g. no need to provide proof; updates to automatic disability conditions; sex discrimination in relation to fertility treatment; more generous leave to support those under the umbrella of family-friendly policies.

ACAS - updated information needed about conditions that are automatically classed as a disability.

Neighbouring forces - information about neurodiverse conditions and how to best support those who are neurodiverse in the workplace.

Existing policy - the policy remains in line with the Equality Act 2010 so we will be keeping as much of it as possible, provided that it's still relevant and in line with best practice and case law outcomes.

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

We held focus groups with the staff support networks and are seeking feedback on the amended policy. We also engaged with HR Operations, and will be undertaking consultation with the Police Federation, Superintendents Association and trade unions.

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	The information in the old policy regarding age was fairly sparse so the new policy will have much more detail on this. Information included about application of equality relating to age and positive action. Providing information that individuals don't need large age gaps between them or to be at either end of the age spectrum (very young and very old) to face age discrimination. This makes it clear that anyone can be impacted and therefore the aim is that this policy will impact on all staff and officers positively.
Disability Disabled people, including those with mental health issues.	Updated information about what constitutes a disability. Updates from reasonable adjustment to workplace adjustment and reference to the new Disability at Work Policy not just the management toolkit. All of this will have a positive impact on those with a disability as there is now more information than before to support them, the information is also up-to-date with best practice.
Gender reassignment Trans and non-binary people	As a protected characteristic, gender reassignment is detailed in the policy and there is signposting to the related management toolkit. The policy sets out that no member of GMP will discriminate, either directly or indirectly, about anyone who has or is currently going

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

	through gender reassignment. Non-binary is now included under sex, despite it not being included in the Equality Act 2010. This is to ensure that we offer the same protections within the workplace for those who are binary and non-binary.
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.	More detailed information provided about civil partnerships. This policy sets out the rights of people who fall under this protected characteristic and aims to support those within GMP who are covered by this protected characteristic.
Pregnancy and maternity	This policy contains references to all pregnancy and maternity related policies and toolkits, as well as other related family-friendly guidance. These related policies and toolkits set out the entitlements for those who fall under this protected characteristic. This will have a positive impact as it empowers those who are covered by the protected characteristics to know their rights to leave and pay in various circumstances.
Race People from minority ethnic backgrounds and communities	The policy commits those who work at GMP to not discriminate, either directly or indirectly, any person because of their race.
Religion or belief People with different religions and/or beliefs	Information already existed about religion, but there was not much about belief. Recent tribunal outcomes have helped us develop this section further so that it is now much clearer that those who hold an accepted belief are also protected.
Sex Both men and women	Sex is listed as a protected characteristic and the policy commits that GMP will not discriminate, either directly or indirectly, against anyone due to their sex. There is information about sex discrimination related to those undergoing fertility treatment. This aims to have a positive impact on those with that protected characteristic.
Sexual orientation LGBTQ+ people	Sexual orientation is listed as a protected characteristic and the policy commits that GMP will not discriminate, either directly or indirectly, against anyone due to their sexual orientation. This aims to have a positive impact on those with that protected characteristic.
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.)	Neurodiversity is now included under disability. Despite many neurodiverse people not wishing to label themselves 'disabled', they would be supported in a similar way. Carers are listed specifically and have their own related policy with an aim to ensure that they are supported and no one at GMP causes for them to be discriminated against indirectly. Mental health has also been included to support anybody who falls under any of the protected characteristics. Statement about no hierarchy of protected characteristics. This aims

	to have a positive impact as it encourages individuals to be treated based on their current circumstances, rather than people assuming that their protected characteristic is 'less important' than another's.
--	--

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
None identified		

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):

x	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?
Feedback from officers and staff, including HR Operations colleagues, SSNs, trade unions and staff associations.
Sign off from Head of Department or Service:
Review Date (must match next review date of the policy): To be reviewed annually