

**RECRUITING EX-OFFENDERS POLICY  
 HaRD 065  
 EQUALITY IMPACT ANALYSIS**

1. Equality Impact Analysis	
<b>Policy / Project / Function:</b>	Recruiting Ex-Offenders Policy
<b>Date of Analysis:</b>	31 January 2014
<b>This Equality Impact Analysis was completed by: (Name and Department)</b>	Workforce Service
<b>What are the aims and intended effects of this policy, project or function ?</b>	The CCG actively promotes equality of opportunity for all and welcomes applications from a wide range of candidates, including those with criminal records, as we select all candidates for interview based on their skills, qualifications and experience.
<b>Please list any other policies that are related to or referred to as part of this analysis?</b>	<ul style="list-style-type: none"> <li>• Disciplinary procedure</li> <li>• Appraisal process</li> </ul>
<b>Who does the policy, project or function affect ?</b>  Please Tick ✓	Employees                      ✓ staff moving to different posts  Service Users <input type="checkbox"/>  Members of the Public            ✓ External Applicants  Other (List Below) <input type="checkbox"/>

## 2. Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g., from previous engagement) to evidence this impact
	Yes	No	Yes	No	
<b>Race</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Age</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Sexual Orientation</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Disabled People</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.

<b>Gender</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Transgender People</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Pregnancy and Maternity</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Marital Status</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
<b>Religion and Belief</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy makes it clear that the existence of a criminal conviction alone should not prevent an offer of employment being made. It explains what should be taken into account when making decisions. The policy is clear that decisions are taken on merit whilst also risk assessing the process.
	As yet there has been no evidence of a positive or negative impact. No anticipated detrimental impact on any equality group. Makes all reasonable provision to ensure equity of access to all staff and the public within a legal framework. Any review of this policy should, however, cover how it has been applied and not just its intention.				
<b>If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7</b>					

### 3. Equality Impact Analysis: Local Profile Data

Local Profile/Demography of the Groups affected as at January 2015	
<b>General</b>	Total number of employees in the CCG is 28
<b>Age</b>	75% are aged 30-55 21.43% of staff are over 55 3.57% of staff are under 30
<b>Race</b>	89.29% staff employed in the CCG are White 3.57% staff are Black 3.57% staff are Asian 3.57% of staff have are not stated/undefined their ethnicity
<b>Sex</b>	46.43% staff employed are male 53.57% staff employed are female
<b>Gender reassignment</b>	No information at this stage
<b>Disability</b>	89.29% of staff employed declared themselves as having no disability 10.71% did not declare / undefined No staff have declared a disability
<b>Sexual Orientation</b>	89.29% of staff described themselves as heterosexual 10.71% did not wish to respond / undefined
<b>Religion, faith and belief</b>	Christianity is the largest religious group declared by staff in the CCG (50%) 25% declared themselves Atheist 17.87% were undefined or did not wish to declare 3.57% of staff have other beliefs / religious beliefs 3.57% of staff declared themselves Buddhist
<b>Marriage and civil partnership</b>	78.58% of employees are married. No employees are in a civil partnership. 3.57% of staff did not wish to declare. The remainder (17.85%) are single / divorced / legally separated or widowed
<b>Pregnancy and maternity</b>	No information yet as the CCG has not been established long enough to build meaningful data

#### 4. Equality Impact Analysis: Equality Data Available

<p><b>Is any Equality Data available relating to the use or implementation of this policy, project or function?</b></p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> <li>1. Application success rates <i>Equality Groups</i></li> <li>2. Complaints by <i>Equality Groups</i></li> <li>3. Service usage and withdrawal of services by <i>Equality Groups</i></li> <li>4. Grievances or decisions upheld and dismissed by <i>Equality Groups</i></li> <li>5. <i>Previous EIAs</i></li> </ol>	<p>Yes <input checked="" type="checkbox"/> employee data</p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p><b>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</b></p>	<p>Consultation has taken place nationally and locally with Trade Unions</p>
<p><b>Promoting Inclusivity</b>  <b>How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</b></p>	<p>This Policy provides a framework to ensure no applicant is unfairly treated following the disclosure of a conviction and therefore contributes to the aims of eliminating discrimination</p>

## 5 Equality Impact Analysis: Assessment Test

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Gender</b> (Men and Women)	✓			Considered, no impact
<b>Race</b> (All Racial Groups)	✓			Considered, no impact
<b>Disability</b> (Mental and Physical)	✓			Considered, no impact
<b>Religion or Belief</b>	✓			Considered, no impact
<b>Sexual Orientation</b> (Heterosexual, Homosexual and Bisexual)	✓			Considered, no impact

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Pregnancy and Maternity</b>	✓			Considered, no impact
<b>Transgender</b>	✓			Considered, no impact
<b>Marital Status</b>	✓			Considered, no impact
<b>Age</b>	✓			Considered, no impact

## 6. Action Planning

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:

## 7. Equality Impact Analysis Findings

<b>Analysis Rating:</b>	<input type="checkbox"/> Red	<input type="checkbox"/> Red/Amber	<input type="checkbox"/> Amber	<input checked="" type="checkbox"/> Green
-------------------------	------------------------------	------------------------------------	--------------------------------	---

		Actions	Wording for Policy / Project / Function
<b>Red</b> <b>Stop and remove the policy</b>	<b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	<b>Remove the policy</b>  Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.	No wording needed as policy is being removed
<b>Red Amber</b> <b>Continue the policy</b>	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.	<b>The policy can be published with the EIA</b>  List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).  Consider if there are any potential actions which would reduce the risk of discrimination.  Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason exists which justifies the use of this policy and further professional advice.  <b><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></b>



**Equality Impact Findings (continued):**

		Actions	Wording for Policy / Project / Function
<p><b>Amber</b> <b>Adjust the Policy</b></p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p><b>The policy can be published with the EIA</b></p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><b><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></b></p>
<p><b>Green</b> <b>No major change</b></p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>The policy can be published with the EIA</b></p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

<b>Brief Summary / Further comments</b>	
---	--

<b>Approved By :</b>		
Job Title :	Name :	Date :