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Date: 28th May 2024

Our ref: 2024-457

Reply contact name:

Dear XXXXX,

I write in connection with your request for information dated 26th April 2024 regarding discrimination.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Following receipt of your request, research was conducted by Professional Standards at Wiltshire Police.

Your request for information has now been considered and I am able to respond as follows.

You wrote (and Our Response):

1. How many complaints of each of the following types of discrimination were reported to your organisation in 2021, 2022 and 2023:

- a) Disability discrimination
- b) Race or ethnicity discrimination
- c) Sexual orientation discrimination

	2021	2022	2023
Disability	1	3	1
Race or ethnicity	2	1	0
Sexual Orientation	0	0	0

2. How many complaints were reported to your organisation about discrimination related to a person's HIV status in:

- a) 2021
- b) 2022
- c) 2023

0 (zero)

3. If HIV-related discrimination complaints were reported to your organisation, how many of the following incidents were reported?

- (a) Refusal of a service after HIV status was shared.
- (b) Failure to make reasonable adjustments for a person's HIV status.
- (c) Harassment related to a person's HIV status.
- (d) Use of an organisational policy that discriminated against a person based on their HIV status.
- (e) Another kind of HIV discrimination incident.

N/A

4. If HIV-related discrimination complaints were reported to your organisation, were they reported by?

- (a) Members of the public.
- (b) Employees of your organisation

N/A

5. If HIV-related discrimination complaints were reported to your organisation, how many complaints were upheld?

N/A

6. Does your organisation have a policy to deal with incidents of HIV discrimination reported to them at a strategic level? If so, could you explain what the policy is or attach a copy of said policy?

[Please see policy document below.](#)

I am satisfied that all the relevant information has been passed to me and been considered in the light of your request within the time constraints applicable under the legislation.

Wiltshire Police would like to thank you for the interest that you have shown in the Force.

Yours sincerely

Force Disclosure Decision Maker

WILTSHIRE POLICE FORCE POLICY



Equal Opportunities Policies & Procedures

Date of Publication: June 2020
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TABLE OF CONTENTS

POLICY STATEMENT	4
POLICY AIM	4
APPLICABILITY	5
LEGAL BASIS AND DRIVING FORCE	5
RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS	5
DATA PROTECTION	5
FREEDOM OF INFORMATION ACT 2000	5
EQUALITY IMPACT ASSESSMENT	5
MONITORING AND REVIEW	5
WHO TO CONTACT ABOUT THIS POLICY	6
 DIGNITY AT WORK POLICY.....	6
Types of unlawful discrimination	6
Legal Framework and National Guidance.....	7
 POSITIVE ACTION POLICY	8
The role of Monitoring.....	8
Legal Framework and National Guidance.....	8
 DISABILITY POLICY	9
Responsibilities of managers and employees.....	9
Recruitment	9
Induction	9
Training and Career Development.....	9
Employee Benefits.....	9
Retention	10
Promotion	10
Medical or occupational health reports	10
Reasonable adjustments	10
Removing Barriers.....	10
Legal Framework and National Guidance.....	10
 RELIGION BELIEF AND CULTURAL AWARENESS POLICY	11
Religious Observance.....	11
Standards of Dress	11
Dietary Requirements	11
Wiltshire Police Chaplaincy Service.....	11
Legal Framework and National Guidance.....	12
 TRANSGENDER AND THE WORKPLACE POLICY	13
Our commitment	13
Definitions.....	13
The law	13
How our organisation supports transgender employees.....	14
Recruitment	14
Proof of Identity	14
Pre-Employment Discussions.....	14
Monitoring.....	15
Employment.....	15
Names and pronouns	15
Changing employee records.....	16

Confidentiality	16
Communication.....	16
Single-sex toilets and facilities	16
Dress codes.....	17
Supporting an employee who is transitioning	17
Legal Framework and National Guidance.....	18
MAKING REASONABLE ADJUSTMENTS – GUIDANCE FOR MANAGERS	19
1. INTRODUCTION: THE LEGAL DUTY TO MAKE REASONABLE ADJUSTMENTS	19
The Equality Act 2010.....	19
Who is ‘disabled’?.....	19
What are reasonable adjustments?	19
Why are reasonable adjustments needed?	20
Who has responsibility for making reasonable adjustments?	20
Who determines what is ‘reasonable’?	20
Who pays?.....	20
Declaring a Disability	20
2. THE DUTY IN PRACTICE	21
2.1 RECRUITMENT AND SELECTION	21
2.2 WORKPLACE ADJUSTMENTS.....	21
2.3 PROCESS: PERSONAL RISK ASSESSMENT	21
Identifying needs in the workplace	21
Implementing reasonable adjustments.....	21
Emerging needs	22
Records and confidentiality	22
The Force Personal Emergency Evacuation Plan (PEEP).....	23
2.4 ABSENCE	23
Disability Related Leave.....	23
Paid leave	23
3. PROCEDURES	23
Useful Contacts and further advice	24
Legal Framework and National Guidance	25
Reasonable Adjustment Flowchart.....	26
DOCUMENT ADMINISTRATION.....	27

POLICY STATEMENT

Wiltshire Police is committed to the principles of equality, diversity and inclusion and will strive to become an employer of choice. We will achieve this through developing a diverse workforce and engaging with the public. We will do this because we believe the principles of equality and diversity are about social justice, fairness, human rights and equal access to opportunities. We will act in accordance with the Code of Ethics and respect the rights of our staff and communities to ensure they are treated with dignity, fairness and respect.

We will strive to develop our workforce to be truly representative of all sections of our community that we serve. We will provide a workplace where each individual feels respected and able to give their best. We will build trust and confidence in the integrity and professionalism of our officers and staff and the service we deliver. Wiltshire Police has a zero tolerance approach to bullying, harassment and victimisation on the grounds of protected characteristics.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability underpinned by the values and principles of the Code of Ethics. Diverse teams bring variety of thought, innovation and creativity and will help us to better understand the needs of our communities. All employees will be encouraged to develop to their full potential so that the combined talents and resources of the workforce are used to the best effect.

This policy has two main aims. Firstly, to ensure that we meet our legal obligation and that no individual receives less favourable treatment because of a protected characteristic as defined under the Equality Act 2010. Secondly, this policy aims to help Wiltshire Police create an environment in which individual differences and contributions of all our staff are recognised and valued.

This policy is an amalgamation of previously separate policies and procedures. The Wiltshire Police Equal Opportunities Policies cover:

[Dignity at Work Policy](#)

[Positive Action Policy](#)

[Disability Policy](#)

[Religion, Belief and Cultural Awareness Policy](#)

[Transgender Policy](#)

[Making Reasonable Adjustments – Guidance for Managers](#)

Staff should not discriminate against, or harass a member of the public in the provision of our services or that of one of our partner agencies. It is unlawful to fail to make reasonable adjustments including the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, we have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

This area of disability is underpinned by Wiltshire Police being leaders in the government scheme that is supported by the DWP regarding the 'Disability Confident Scheme'.

Additionally, no employee or potential employee will be treated less favourably on the grounds of trade union or staff association membership or non-membership.

POLICY AIM

To ensure that we meet our legal obligation; that no individual receives less favourable treatment because of a protected characteristic as defined under the Equality Act 2010 and to help Wiltshire Police create an environment in which individual differences and contributions of all our staff are recognised and valued.

[Table of Contents](#)

APPLICABILITY

All police officers and staff, including the extended police family and those working voluntarily or under contract to Wiltshire Police must be aware of, and are required to comply with, all relevant policy and associated procedures.

LEGAL BASIS AND DRIVING FORCE

The Equality Act 2010 provides the legal framework and is the legislation that eliminates these types of unlawful actions:

- Direct discrimination
- Indirect discrimination
- Discrimination by perception
- Discrimination by association
- Victimisation
- Harassment

Protected characteristics under the Equality Act 2010 are as follows:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

It is unlawful to discriminate directly or indirectly in recruitment or employment because of these highlighted characteristics.

RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS

[Equality, Diversity and Inclusion Strategy 2019-2021](#)

[Positive Action Delivery Plan 2020-21](#)

[College of Policing Positive Action Guidance](#)

[People, Culture and Inclusion Strategy](#)

[Police and Crime Plan 2017-2021](#)

[Issue Resolution and Dignity at Work Policy](#)

DATA PROTECTION

Any information relating to an identified or identifiable living individual recorded as a consequence of this policy will be processed in accordance with the Data Protection Act 2018, General Data Protection Regulations and the Force [Data Protection Policy](#).

FREEDOM OF INFORMATION ACT 2000

This document has been assessed as suitability for public release.

EQUALITY IMPACT ASSESSMENT

A Equality Impact Assessment has been undertaken in terms of the nine protected characteristics of the Equality Act of 2010 (Age, Disability, Gender Reassignment, Sexual Orientation, Race, Pregnancy/Maternity Religion/Belief, Sex, Marriage and Civil Partnership). Wiltshire Police has adopted Equality Impact Assessment and Guidance provided by the College of Policing to ensure that best practice is followed in assessments undertaken.

MONITORING AND REVIEW

This policy will be reviewed yearly to reflect best practice and any changes to legislation and case law or national guidance or at such other times as may become necessary.

WHO TO CONTACT ABOUT THIS POLICY

The Director of People and Change is responsible for this policy. All queries relating to this policy should be directed to the Equality, Diversity & Inclusion Team or the Force Policy Officer.

DIGNITY AT WORK POLICY

Where a complaint or report of bullying or harassment in the workplace is made, it will be considered seriously and as a priority. Such behaviour may amount to a criminal offence and/or may result in internal misconduct action or legal proceedings through a Tribunal or Civil Court.

For further information on issue resolution procedures please see the [Issue Resolution and Dignity at Work Policy and Procedure](#) which details the sources of advice and support for individuals.

Wiltshire Police has a duty of care to its employees. If an allegation of bullying or harassment falls outside of the scope of issue resolution this can be reported to professional standards or anonymously to the anti corruption unit.

An assessment will be undertaken and misconduct proceedings may be deemed necessary as per the disciplinary procedure/conduct regulations.

Types of unlawful discrimination

The examples provided are intended to be illustrative and are not to be considered exhaustive.

Bullying is offensive, intimidating, malicious or insulting behavior, and/or abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity which are covered by direct discrimination) that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Examples of unacceptable behavior include (but are not limited to):

- physical conduct ranging from unwelcome touching to serious assault
- demeaning comments about a person's appearance
- unwelcome jokes or comments of a sexual or racial nature or about an individual's protected characteristic, e.g. age, disability, sexual orientation (including perceived sexual orientation), gender identity and/or expression, or religion
- Threats or the offer of rewards for going along with sexual advances
- the use of obscene gestures
- questions about a person's sex life
- ignoring an individual because they are perceived to have a protected characteristic when they do not, in fact, have the protected characteristic, e.g. an employee is thought to be of a certain religion or belief, or is perceived to be transgender
- unwanted nicknames, whether related or unrelated to a person's protected characteristic
- ridiculing someone
- excluding someone from social activities

Direct discrimination is where a person is treated less favorably than another because of a protected characteristic.

[Table of Contents](#)

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government and Acas) pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

For example, if an employee with a disability raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Legal Framework and National Guidance:

Health and Safety at Work Act 1974

Protection from Harassment Act 1997

Equality Act 2010

Data Protection Act 2018

Management of Health and Safety at Work Regulations 1999 (SI 1999/3242)

General Data Protection Regulation (2016/679 EU)

POSITIVE ACTION POLICY

Wiltshire Police are committed to supporting and encouraging positive action so that the Force can progress towards our goal of developing a diverse workforce that reflects our communities.

In employment, Positive Action covers a series of measures that can be taken to help redress any imbalances that may have arisen in the workplace as a result of past or current discrimination or disadvantage. This legal framework is applied to address under-representation in respect of the nine protected characteristics listed under the Equality Act 2010.

Positive Action provides a range of **lawful actions** that overcome or minimise disadvantages in relation to employment opportunities that people who share a protected characteristic may experience, or to meet their different needs. Section 158 of the Equality Act 2010 allows employers to use the positive action general provisions.

Positive Action gives individuals from under-represented groups a chance to access support and training, in preparation for and throughout recruitment process, to overcome disadvantages competing with others. It is **not** about lowering standards, but rather encouraging and getting candidates to an equal playing field; selection is based on merit only.

The positive action provisions in the Equality Act 2010 are voluntary. Other than in respect of disability under s13(3) of the Equality Act 2010, positive discrimination remains unlawful.

The role of Monitoring

Identification of under representation is the first step before any positive action initiatives should be undertaken; [College of Policing Guidance](#) must be followed to ensure that best practice is complied with in an evidence based approach. The Force is therefore committed to monitoring across all strands of diversity, throughout all recruitment, selection and promotion processes.

Where under representation is identified, further work will be carried out to try to establish what the barriers may be. Where appropriate, positive action initiatives will then be undertaken with a view to redressing any imbalance. The rationale for the action taken will be evidenced with supporting data and monitored to ensure legal compliance.

Legal Framework and National Guidance

Employment Rights Act 1996

Equality Act 2010

Data Protection Act 2018

General Data Protection Regulation (2016/679 EU)

DISABILITY POLICY

Wiltshire Police remains committed to being a Disability Confident Leader. As a Disability Confident Leader we have completed a self-assessment to an external challenge and validation. We are taking an active leadership role in encouraging and helping other employers on the journey to becoming Disability Confident.

Responsibilities of managers and employees

If a job applicant or an employee believes that they have a disability that may disadvantage them in respect of recruitment or employment, they should inform the organisation. Managers also have a responsibility to be alert to the possibility that an individual may have a disability and that it may be necessary to make reasonable adjustments.

Recruitment

Reasonable adjustments to the recruitment process will be made by recruitment/positive action team as required to ensure that no applicant is disadvantaged because of their disability. Applicants (including internal applicants) who meet the minimum criteria in the essential competencies as set out in the job description will be interviewed under the Disability Leaders Scheme – 'guaranteed Interview'.

Induction

'Access to Work' to be involved with employees once start dates are established. Once a formal job offer has been given along with a start date the employees' line manager will consult with the employee to ensure such reasonable adjustments are made to enable the employee to work safely and effectively and to secure equal access to the benefits of employment. Contact with 'Access to Work' through the DWP/Job Centre Plus is vital during the first 6 weeks of employment due to cost sharing:

- During the first 6 weeks – all costs sharing is covered 100% by Access to work
- After 6 weeks cost sharing is put in place by DWP/Job Centre Plus with a minimum of £1000 payable by Wiltshire Police

Where the line manager does not have the relevant knowledge or experience to make the reasonable adjustments they will consult with HR and/or the Occupational Health Department. Where necessary, an outside specialist may be consulted.

Wiltshire Police are now able to offer an in-house Dyslexia Assessment Team that can provide advice and assessments as requested by either staff members or line managers. An assessment can be arranged by completing the [Dyslexia Assessment Referral Form](#). Line managers can request that assessments take place or individuals can self refer by contacting People Services or the EDI Team for further advice.

Training and Career Development

All employees will have equal access to training and opportunities for promotion and other aspects of career development. Each element of the promotion procedure and all training opportunities will be made accessible to disabled employees and the positive action team are available to provide support.

Where, during the course of employment, a disabled employee recognises the need for further reasonable adjustments to their working arrangements, or to a feature of the premises, they should discuss this requirement with their line manager. The line manager can seek clarity from HR and/or Occupational Health prior to determining the appropriate adjustments.

Employee Benefits

Disabled employees will have equal access to all benefits and facilities that are made available to Wiltshire Police employees (subject to reasonable adjustment to the estate/facilities).

Retention

As part of its commitment to equal opportunities for disabled people the organisation will ensure that all reasonable measures are taken to retain disabled employees in employment. It will be the responsibility of line managers to ensure that they are properly informed and to consider reasonable adjustments with regard to an employee who has a disability.

If redeployment is suggested by the FMO (Force Medical Officer) as the reasonable adjustment, the employee will be viewed as a priority within the redeployment procedure (subject to the rights of an employee on maternity leave who is at risk of redundancy).

Promotion

Wiltshire Police values all Officers and staff during the promotion process and will ensure they are supported appropriately with any reasonable adjustments that may be required.

Medical or occupational health reports

To aid discussions about the employee's condition (with the employee) at a case conference, the organisation may request a medical, vocational or functional assessment of the employee in relation to the disability. As part of the assessment, it may be helpful to obtain a report from the employee's GP or consultant. If a report from the employee's GP or consultant is required, the organisation will explain the employee's rights under the Access to Medical Reports Act 1988.

Wiltshire Police may consider it necessary to obtain a report and/or assessment where, for example, the employee, is unable to fulfil all of the duties and responsibilities of their role, has persistent intermittent short-term sickness absence, has been absent from work on long-term sickness absence or is likely to be or may be at a substantial disadvantage in seeking promotion compared to someone who does not have that disability.

The aims and objectives of obtaining a report and/or assessment is to ascertain if the employee is disabled; understand better the nature of the employee's disability and the impact on the employee's ability to perform their role; or consider what, if any, reasonable or long-term health adjustments should be made. The report or assessment findings will be discussed with the employee.

Reasonable adjustments

The organisation will make such adjustments as are reasonable to enable a disabled employee to carry out their duties and to remain in employment. These may include but are not limited to, the provision of specialist equipment and training, alterations to physical features of the workplace, job redesign, retraining, flexible hours, remote working and/or redeployment to a suitable alternative vacancy.

Please refer to '[Making Reasonable Adjustments – Guidance for Managers](#)' section for further guidance.

Removing Barriers

Wiltshire Police recognises the importance of taking proactive measures to remove barriers, physical or otherwise, from the working environment for disabled people. It is recognised that this will benefit not only disabled employees and prospective employees but also our customers and visitors.

Legal Framework and National Guidance

Access to Medical Reports Act 1988

Equality Act 2010

Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

General Data Protection Regulation (2016/679 EU)

Employment statutory code of practice

RELIGION BELIEF AND CULTURAL AWARENESS POLICY

Wiltshire Police are an equal opportunities employer and we embrace diversity and inclusion.

The Equality Act 2010 protects all workers against direct and indirect discrimination on the grounds of "any religion, religious belief or philosophical belief". This can include a lack of religion or lack of belief.

The diversity provisions within this policy is not intended to be exhaustive and Wiltshire Police welcomes the identification of all diversity needs.

Religious Observance

It is Wiltshire Police's policy to endeavour, on request, to alter an employee's working pattern so that breaks can be granted at times that coincide with their needs for religious observance (as per the Flexible Working Policy and Procedures). Where at all possible the force will endeavour to provide suitable space within its estate for religious observance whilst at work.

Alternatively, the organisation will, where appropriate, endeavour to grant employees reasonable time off during working hours for religious observance insofar as this is possible and practicable, taking into account the needs of the business and whether or not such arrangements might cause disturbance or disruption to other members of staff and/or their work or work patterns (and as per the principles in the [Leave Procedure](#)).

However, where an employee requests time off at a particularly busy time or at a time when the employee's absence would otherwise cause difficulties for the business or their department, or where the amount of time off requested is unreasonable or excessive (taking into account the needs of the business), the organisation reserves the right to refuse to grant some or all of any of the time off requested.

All employees, whatever their religion or belief, will be treated equally in respect of requests for time off for religious observance or requests for alterations to their working patterns for religious reasons.

Standards of Dress

The intention is that diversity requirements will be positively supported where possible and operationally safe, following the undertaking of a risk assessment in relation to the specific role to be performed. Please refer to the [Standards of Dress Procedure](#) for further detail.

Dietary Requirements

Wiltshire Police will take all reasonable measures to ensure its catering services accommodate religious or cultural dietary needs where sufficient notice has been provided.

Employees must ensure that all food placed in the fridges on Wiltshire Police property are stored in sealed containers at all times. This is for the benefit of all employees, some of whom may wish to ensure that their food does not come into contact with, for example, meat products.

Wiltshire Police Chaplaincy Service

Chaplains are an invaluable source of support for Police Officers and staff within Wiltshire Police, by providing advice, education and training on multi-faith issues. Whilst they cannot formally represent all faiths, they represent an impartial source of support and guidance on issues regarding Religion or belief and Cultural needs.

Legal Framework and National Guidance

Employment Rights Act 1996

Human Rights Act 1998

Equality Act 2010

Working Time Regulations 1998 (SI 1998/1833)

Flexible Working Regulations 2014 (SI 2014/1398)

Employment statutory code of practice

TRANSGENDER AND THE WORKPLACE POLICY

This policy outlines Wiltshire Police's commitment to ensuring that transgender employees are treated with dignity and respect and are not disadvantaged in the workplace. It sets out the steps the organisation takes to welcome and support transgender employees and prevent discrimination. This policy covers all employees, contractors, temporary workers, volunteers and job applicants and applies to all stages of the employment relationship. A toolkit is available for guidance and reference; this hosted on the Equality, Diversity and Inclusion portal page [Stonewall Guidance Toolkit](#)

Our commitment

The organisation believes that diversity and inclusion bring benefits to the business and that people work well when they can be themselves.

Wiltshire Police is committed to welcoming and supporting transgender employees and removing barriers to their recruitment, promotion and retention. Providing a working environment that is free from discrimination, harassment or victimisation because of gender identity is an important step in ensuring that transgender employees are respected and valued.

Gender reassignment is a protected characteristic in the Equality Act. In addition to this Wiltshire Police has a zero tolerance approach to discrimination against a person because of their gender identity and/or gender expression.

Definitions

Definitions and terminology regarding transgender people are evolving. Individuals will self-identify and how they choose to describe themselves should be respected by their managers and colleagues. For the purposes of this policy a transgender person is someone who has a deep conviction that their gender - whether they are a man or a woman - does not conform to the sex they were assigned at birth – this is known as gender dysphoria.

Using inappropriate language and terminology can cause offence and distress and undermines the organisation's efforts to create an inclusive workplace for transgender people.

The organisation recognises that gender identity and sexual orientation are not interchangeable terms and so employees should not assume that a transgender colleague has a particular sexual orientation.

The law

The Equality Act 2010 protects a person from discrimination, harassment and victimisation if they are "proposing to undergo, are undergoing, or have undergone a process (or part of a process) of gender reassignment". There is no requirement for the person to be under medical supervision as gender reassignment is considered to be a personal rather than a medical process. Under the Act, a person who takes time off work for gender reassignment must not be treated less favourably in respect of employment decisions, for example by being denied access to training or promotion opportunities.

The Act also protects anyone who is perceived to have the characteristic of gender reassignment or is associated with someone who has the protected characteristic of gender reassignment, such as an individual's partner or a friend.

An employee who treats a colleague less favourably because of gender reassignment, for example by refusing to work for them, may be held personally liable for discrimination.

[Table of Contents](#)

The Equality Act of 2010, places additional duty on public employers to take positive steps to combat unlawful discrimination and harassment of transgender workers.

Gender Recognition Act - The Gender Recognition Act 2004 allows transgender people to apply for a gender recognition certificate (GRC), which will give them legal recognition in their acquired gender and enables them to obtain a new birth certificate.

The Act safeguards the privacy of an individual with a GRC by defining information relating to the gender recognition process as "protected information" and, except "in certain specific circumstances" (for example, for the purpose of preventing or investigating crime), it is a criminal offence to disclose such information without the individual's consent.

An application for a GRC will be made to the Gender Recognition Panel. Individuals are required to provide a medical diagnosis of gender dysphoria and evidence that they have lived in their acquired gender for two or more years and intend to do so permanently.

Transgender people are not required to apply for a GRC and many choose not to for various reasons. An individual should never be asked if they have a GRC and to do so could be considered harassment.

How our organisation supports transgender employees

To promote a workplace that is inclusive of transgender people, the organisation adopts the following approach.

Recruitment

Wiltshire Police wishes to attract applicants from as wide a talent pool as possible and the recruitment process is designed to be inclusive of transgender applicants. Except in exceptional defined circumstances, a job applicant's gender identity is irrelevant.

Job advertisements should make clear that opportunities are open to all suitably qualified applicants irrespective of their gender identity or gender expression.

Managers should not ask questions about an applicant's gender identity or gender history. If an individual chooses to mention this during the interview, they should be informed that the organisation supports transgender employees and assure that the disclosure will have no bearing on the outcome of the interview and will not be revealed outside the interview room.

Proof of Identity

Wiltshire Police will always ensure that an applicant is made aware of the full range of permissible identification documents and that the process of checking is handled sensitively and with respect for privacy of the individual.

Where an individual's documentation (including any qualification certificates) reveals their previous name and thereby their gender history, this information will be kept confidential and stored securely with the permission of the individual and in accordance with the organisation's data protection policy.

Pre-Employment Discussions

There are limited exceptions where the Equality Act 2010 permits discrimination against someone on the grounds of gender reassignment. These are:

- Where being of a particular sex is an occupational requirement for the job and the employer can show that it is reasonable to prevent the transgender person from doing the job as a result;

-
- If the job involves conducting intimate searches pursuant to statutory powers, such as the Police and Criminal Evidence Act 1984; or
 - If the job involves working in a private home where there would be close physical or social contact, or knowledge of the intimate details of a person's life, and the employer can show that people would reasonably object to the job holder being someone who was undergoing or had undergone gender reassignment.

In roles where there is a potential conflict in specific roles, e.g. in relation to searching, line managers and HR will discuss the implications with the individual and determine an appropriate and agreed approach to the issue. This will include discussing the practical difficulties around the maintenance of confidentiality and the responsibility placed on the individual in respect to searches.

Monitoring

In line with its policy on equal opportunities in employment, the organisation will monitor the gender identity and transgender status of the existing workforce and of applicants for jobs (including promotion) and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the organisation will implement them.

The disclosure of information by employees/job applicants is voluntary and any information disclosed will be treated in confidence, stored securely and used only to provide statistics for monitoring purposes. When communicating monitoring data, the organisation will ensure that it is anonymised to avoid identifying individuals.

Employment

An employee who is transitioning may wish to be redeployed on a temporary or permanent basis. This may be because the individual is in a public-facing role and wishes to avoid having to answer questions from the public about gender status, or the role involves particular tasks, that will be difficult to undertake if undergoing a particular type of treatment. Requests to be redeployed will be discussed with the employee and, where possible, the organisation will seek to accommodate the employee's wishes.

A manager should not put pressure on an individual to change jobs or make assumptions about their capability or wishes.

An employee's gender history or status will not have a bearing on any employment decisions or access to benefits, except where permitted by law. For example, an individual who has transitioned but does not have a GRC may be required to disclose their gender history for insurance and pension purposes. In such circumstances, the organisation will handle such information in line with its data protection policy.

Where pension and insurance providers request disclosure of an individual's gender status, the organisation will ensure that this requirement has been checked with the underwriter and the requirement is made clear in any scheme information provided to employees. In such circumstances, the employee's written consent will be obtained before disclosing their gender history and status.

Names and pronouns

Wiltshire Police will always respect an individual's chosen pronoun and will take all necessary steps to ensure that an individual's change of name is respected.

A GRC is not required to enable a transgender person to change their name and the organisation will never ask an individual if they have a GRC to verify a name change, as to ask such a question would be inappropriate.

[Table of Contents](#)

Changing employee records

Any records that hold personal details should be changed by the time the individual presents at work with their new identity. Records will include all of the systems that may contain names, titles and other personal identifiers such as photographs on the Force's website and intranet.

Confidentiality

All records that include details of an employee's gender history will be destroyed in a secure manner, unless there is a specific reason for retaining them. Where other people in the organisation need to be aware of the employee's transition to make a change to a particular record, HR will obtain the employee's consent and restrict the information to those who need to know.

Where there is a need to retain documentation that shows someone's gender history, this information will be stored confidentially in line with the requirements of data protection legislation.

Care will be taken to ensure that any search of the organisation's records by others will not inadvertently reveal an employee's gender history.

It is an individual's decision whether or not to reveal their gender status and history and the organisation will respect their right to privacy. The right to privacy will apply regardless of whether or not the individual has a GRC.

Where an employee discloses information about their gender history or status, verbally or in writing, this will be treated as confidential. This includes any information provided to the line manager or HR. Such information will not be shared with others, unless there is a specific reason and then not without the written consent of the individual concerned.

Information relating to an employee's gender status or history will not be disclosed to a third party without the individual's consent.

Communication

Wiltshire Police will work with the employee to agree what information needs to be conveyed to work colleagues and when the information should be conveyed.

Wiltshire Police will encourage the individual to do what is best for them and if the employee is not ready to tell anyone at the early stages, the organisation will respect the employee's wishes. The employee is entitled to privacy and the organisation will seek to protect them from intrusive enquiries.

Where an employee has a public facing role, Wiltshire Police will discuss with the individual what third parties need to know and how this should be handled.

Wiltshire Police will be mindful of possible media interest and establish a protocol for handling media interest to ensure that:

- A transgender employee is not left to deal with this; and
- Their colleagues understand the importance of not compromising the individual's right to privacy.

Single-sex toilets and facilities

Wiltshire Police will support a transgender employee's right to use the toilets and facilities appropriate to their gender from the point at which the individual declares that they are living their life fully in that gender.

A transgender person should not be expected to use a single-occupancy toilet or an accessible toilet unless they choose to do so or have a disability.

Wiltshire Police will agree with the employee when they wish to start using the facilities appropriate to their acquired gender and how this should be communicated to colleagues. Any concerns raised by others will be dealt with promptly and sensitively, harassment of the individual will not be tolerated.

Dress codes

Wiltshire Police will agree with the employee what flexibility in the organisation's dress code may be permitted to accommodate the process of transition or where a gender-specific mode of dress would be uncomfortable for the individual.

If a transgender employee is required to wear a uniform, Wiltshire Police will ensure that arrangements have been made to provide them with a uniform appropriate to their gender. The uniform will be available from the point at which the individual presents in their new gender status (see [Standards of Dress Procedure](#)).

Supporting an employee who is transitioning

Wiltshire Police will be supportive of an employee who has made the decision to transition so that they can continue to work without fear of discrimination and harassment and those colleagues are helped to understand the process.

Once Wiltshire Police has been made aware by an employee that they will be starting, or have started, the process of transitioning, an appropriate point of contact will be agreed with the employee. That person will work with the employee to develop a confidential support plan to manage the individual's transition at work.

The plan will consider what steps to take before, during and after the employee's transition. No action will be taken without the employee's consent. Please refer to [Transgender Support Plan](#) for further information.

There are some temporary exceptions that apply to someone who intends to undergo gender reassignment or is undergoing gender reassignment.

These temporary exceptions are:

- Where the employee needs to live on premises provided by the employer, reasonable objection could be taken on grounds of privacy and decency to sharing accommodation and facilities, and it is not reasonable to expect the employer either to equip the premises with suitable accommodation or to make alternative arrangements; or
- Where the employee provides vulnerable individuals with personal services promoting their welfare, or similar personal services, and in the reasonable view of the employer those services cannot be effectively provided by a person while that person is undergoing gender reassignment.

Useful Contacts and further advice

For further advice on Transgender issues, please contact People Services and ask for your local HR Advisor. You can also speak to the Occupational Health Unit.

Organisation	Contact details	Services
Wiltshire Police LGBT+ Network	Lee Hare, tel: 101 ext 77467050, direct dial 01793267050 Kate Jackson, tel: 101 ext 77467050	▪ Support network ▪ Sharing good practice
Stonewall	www.stonewall.org.uk Tel 02075931850 Email info@stonewall.org.uk	▪ Help, guidance and support for LGBT communities
Mermaids	https://mermaidsuk.org.uk/ Tel 03443340550 0808 8010400 Email info@mermaidsuk.org.uk	▪ Support for transgender youth (up to and including 19 years), or parents of young persons.
UNISON	www.unison.org.uk Tel 0800 0857 857 Tel 01380 861126	▪ UNISON represents and acts for members
Wiltshire Police Federation	www.polfed.org Tel: 01380 861043	▪ The staff association for police constables, sergeants and inspectors (including chief inspectors)
Wiltshire Ethnic Police Association (WEPA)	WEPA@wiltshire.pnn.police.uk	▪ To promote good race relations and equality of opportunity

Legal Framework and National Guidance

Human Rights Act 1998

Gender Recognition Act 2004

Equality Act 2010

Data Protection Act 2018

General Data Protection Regulation (2016/679 EU)

Government guidance on the recruitment and retention of transgender staff

MAKING REASONABLE ADJUSTMENTS – GUIDANCE FOR MANAGERS

1. INTRODUCTION: THE LEGAL DUTY TO MAKE REASONABLE ADJUSTMENTS

The Equality Act 2010

Who is 'disabled'?

- Under section 'e' of the Equality Act, a person has a disability if:
- They have a physical or mental impairment, and
- The impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities."

This is quite a broad definition, which is not limited to visible disabilities. For example, the definition cover people with dyslexia, cancer, HIV, back problems and depression.

The Act also makes it unlawful for an employer not to make a 'reasonable' adjustment for someone with a disability, both in the recruitment and selection processes and in the workplace. This also includes probation, PDR, promotion processes and career development opportunities. This legislation covers Police Staff, Officers, Special Constables, trainees and any other people working or applying to work for Wiltshire Police.

What are reasonable adjustments?

Reasonable adjustments are simply modifications that take into account the effects of an individual's disability. For example, modifications could be made to –

- A selection process (i.e. providing forms in Braille)
- The premises or workplace (i.e. installing a hands-free telephone)
- Ways of working (i.e. colour coding a filing system)
- Hours or place of work (i.e. working around medication requirements)
- Leave provisions (i.e. time off for physiotherapy)
- Support at work (i.e. a mentor)
- Training provisions (i.e. training to use voice activated software)
- Communication methods (i.e. large print manuals)

Reasonable adjustments in selection processes are intended to ensure that disabled applicants are able to compete fairly with non-disabled applicants. They are not intended to give an unfair advantage to disabled candidates.

Reasonable adjustments in the workplace are intended to ensure that staff with disabilities have everything they reasonably need to perform their role effectively.

Many non-disabled people expect a suitable chair, table, lighting, stationery and equipment to be provided so that they can perform their role; people with a disability have the right to expect that their needs will also be met. Making reasonable adjustments in the workplace is a simple management function. It makes good business sense to ensure that all our staff have everything they may reasonably need to do their jobs well. This document is intended to provide guidance to managers, who are responsible for making reasonable adjustments.

Why are reasonable adjustments needed?

The 'social model' of disability offers a different perspective to the Equality Act definition of disability: *"The loss or limitation of opportunity to take part in society on an equal level with others due to social and environmental barriers"*

The social model reminds us that treating everyone fairly does not always mean treating people the same; making reasonable adjustments recognises that each individual has individual needs and ensures that disabled staff can access the same opportunities as non-disabled staff.

Who has responsibility for making reasonable adjustments?

The line manager is responsible for making decisions and implementing reasonable adjustments. However, their decisions must be informed by expert advice, for example from the line manager, the relevant HR Professional, as well as the appropriate specialists or approved specialist body and the disabled person. The Occupational Health Team should also be consulted. They can obtain expert advice from the appropriate specialist.

Jobcentre Plus also provides Disability Employment Advisors who can offer advice on adjustments in the workplace called Access to Work.

All reasonable adjustments should be recorded using the [Reasonable Adjustment Passport](#).

Who determines what is 'reasonable'?

It is lawful to decline a request for an 'unreasonable adjustment'. However, only an Employment Tribunal can decide what is reasonable in particular circumstances for each organisation under the Equality Act, but factors such as the size and resources of an organisation as well as health and safety considerations are likely to be taken into account. Consideration should also be given to the likely effectiveness of the adjustment and the practicalities of implementation.

Employers will have to provide a strong justification to defend a failure to make an adjustment and prove that it really was 'unreasonable'. Employment Tribunals can order organisations and individuals to make payment of unlimited compensation to successful claimants under the Equality Act 2010.

It is important that managers consider all the options available and consult the relevant specialists and the employee before deciding that adjustments can or cannot be made. Decisions must be informed and not based on assumptions.

Who pays?

Where the implementation of a reasonable adjustment incurs cost, the Equality Act 2010 expects that employers will cover this.

Funding assistance is also available from your local Jobcentre Plus through the 'Access to Work' scheme. This allows the organisation to identify what an individual requires, with the assistance of a Disability Employment Advisor, and then seek approval for funding assistance. If Jobcentre Plus agrees to provide funding assistance, you can procure the required products and then claim back the agreed level of funding.

Declaring a Disability

There is no legal requirement for anyone to declare they have a disability. It will not place them at a disadvantage and should they decide to declare a disability, this will open up the opportunity for them to have reasonable adjustments made where further support will be addressed. However as a result of a disability, if there is a risk to the individual or others at work, then under the Health and Safety law the individual will need to disclose their disability to the organisation.

It is not enough for the employer to show that they did not know that the disabled person had the disability. They must also show that they could not reasonably have been expected to know about it. Employers should consider whether an employee has a disability even where one has not been formally disclosed, as, for example, not all workers who meet the definition of disability may think of themselves as a 'disabled person'.

2. THE DUTY IN PRACTICE

2.1 RECRUITMENT AND SELECTION

All applicants for police officer, special constabulary and police staff roles are asked whether they require any reasonable adjustments on the application form and in invitation to interview letters. The Recruitment Team will inform interview panels of any adjustments requested; it is the responsibility of the interview panel to ensure that reasonable adjustments are implemented.

The duty to make reasonable adjustments in selection processes doesn't just apply to entry-level recruitment but also to selection processes for career development, specialist posts and promotion opportunities. In order to comply with the Equality Act, reasonable requests should always be accommodated.

2.2 WORKPLACE ADJUSTMENTS

Reasonable adjustments in the workplace vary according to individual need. All adjustment requests should be recorded using the relevant form. For Police Officers who have restrictions to deployment applied for medical reasons should follow the regulations relating to limited duties.

2.3 PROCESS: PERSONAL RISK ASSESSMENT

Please note, prior to commencing the reasonable adjustments process, a [personal risk assessment](#) must be carried out. This requirement is in accordance with the provisions of the Management of Health and Safety at Work Regulations 1999 which states a risk assessment is required when an individual has notified the organisation that they are unfit for duty or experience health changes.

Identifying needs in the workplace

In most cases, an individual knows that they have a disability and tells the organisation so that the necessary steps can be taken to meet their needs and maximise their performance at work. However, there are also members of staff who discover a learning difficulty or develop a medical condition later in their career. Managers are advised to be proactive and seek expert advice if they notice any trends such as behavioural differences, discrepancies between ability and performance or recurring health issues; it may be that someone is unaware that they have a disability. It should also be noted that some staff with disabilities might be reluctant to disclose their disability if they fear that the organisation will not respond positively.

Implementing reasonable adjustments

Once an individual's needs have been identified, the reasonable adjustments should be implemented as soon as possible. If there is a delay, the individual should not be placed at a disadvantage. Consideration should be given to providing alternative suitable work or paid leave whilst the reasonable adjustments are awaited if necessary. The following points are critical success factors –

- **Communication** – involve the individual and keep them informed of progress
- **Timeliness** - implement adjustments without undue delay
- **Support** – ensure that the individual has the support they need
- **Risk assessment** – ensure that new equipment or furniture has been risk assessed to ensure no adverse impact on health & safety in the workplace

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- **Training & familiarisation** – ensure that the individual is trained in how to use any new equipment – they should be allowed time to adjust to new ways of working or using new technology (this should be taken into account in any performance reviews)
 - **Regular review** – the line manager should meet with the individual regularly to ensure that their needs are still being met. The Force has an obligation to review adjustments at least annually but many adjustments will require more frequent reviews, particularly in the initial stages.

Emerging needs

Whilst many reasonable adjustments are made as a 'one-off' solution to assist the individual in their role, there may be times when additional adjustments are required.

For example –

- Following a transfer or re-alignment of responsibilities
- To access a training event/course
- To participate in a career development scheme
- Following a promotion or new role
- Following an intense period of rehabilitation or treatment
- To attend a regional meeting or seminar
- Due to implementation of new working methods or technology
- Following a change in the nature of a condition
- Following a period of absence
- It has been identified that an aspect of the role or workplace is exacerbating the condition
- During a grievance or disciplinary procedure
- Due to a change in personal circumstances
- To alleviate the impact of a period of potential stress at work (i.e. re-structures or implementation of new IT systems)

'Access to Work' funding may be available from Jobcentre Plus to assist in making such adjustments.

Records and confidentiality

Line managers must complete the form and submit to the HR Advisor to ensure that adjustments are recorded and monitored. Adjustments can also be recorded on the OHU Feedback. Adjustments will be recorded on the computerised HR System for monitoring purposes; access to these records is restricted. For Adjusted officers, adjustments can be shown on their passport.

Details of someone's disability should only be disclosed on a 'need to know' basis. Often, it is not the name of the disability that needs to be disclosed but the individual's requirements or the effects of the medical condition or learning disability. For example, if someone is going on a course, the trainer needs to know what reasonable adjustments are required, but may not need to know what the individual's disability is. In any case, managers should consult with the individual.

Please note that under the Equality Act 2010 if a member of staff tells a manager that they have a disability, the organisation is considered to know about the disability and will be expected to fulfil its legal duty to make reasonable adjustments. Therefore, managers should explain to staff that they will need to inform the relevant specialists (i.e. HR/OH but assures staff that details of their disability will only be shared on a 'need to know' basis.

The Force Personal Emergency Evacuation Plan (PEEP)

Where appropriate, line managers must complete the [Force Personal Emergency Evacuation Plan \(PEEP\) Form](#) in consultation with the individual. This form is used for all disabled employees and other persons who may require assistance to ensure their safe evacuation in the event of a fire/emergency.

2.4 ABSENCE

Disability Related Leave

Providing disability related leave may also be considered a reasonable adjustment. Disability related leave enables a worker to adjust to changes caused by the development of a new disability, or to manage an existing disability. This type of leave covers time off for therapy, hospital appointments, rehabilitation, assessment, treatment, or training, but not sickness. This type of leave plays an important part in keeping an individual fit for their role.

Disability related leave must not be used to cover periods of sickness absence, whether or not the sickness absence is directly related to the person's disability. Disability related leave is generally for a fixed period of time, whether one-off or a regular appointment. It is usually known about in advance and arrangements should be made with line managers to take this type of leave. See [Attendance Management Procedure](#).

Examples could include -

- Allowing time off work for an individual with Parkinson's disease to undertake a programme of physiotherapy
- Providing leave to an individual to receive treatment such as psychotherapy
- Allowing absence for a worker who is developing a hearing impairment to undertake a British Sign Language course
- Providing leave for a worker with visual impairment to attend a four-week residential course to be trained to use a new guide dog
- Allowing a worker with a back problem to see a physiotherapist in duty time once a week
- Providing time off for a worker receiving treatment for cancer

Managers will need to consider whether each request is reasonable, and whether it is reasonable to provide paid leave or unpaid leave. This should be done in consultation with HR. Disability related leave should not be included in Bradford Score calculations.

Paid leave

Please note that if someone is off work because the organisation has not yet provided the required reasonable adjustments, this is not disability related leave or disability related sickness. It is paid leave because the individual is willing to work, but they are not able to, because the organisation is not fulfilling its duty to make reasonable adjustments.

3. PROCEDURES –

Reasonable adjustments may also be made in the following people management procedures –

- Attendance management - absence monitoring and sick pay
- Probationary performance assessments
- Performance & Development Reviews
- Training and career development schemes
- Issue resolution and discipline procedures
- Transfer, promotion and specialist post selection processes
- Allocation/accessibility of benefits and facilities

This list is not exhaustive and it is important to note that managers will have to liaise with specialists to determine what is reasonable in each individual case.

It is also important to remember to undertake a risk assessment on any reasonable adjustment to ensure that new equipment or furniture does not have an adverse impact on safety in the workplace.

Reasonable adjustments should also be considered within role specific procedures such as -

- Giving evidence in court
- Taking statements
- Taking details from the public
- Driving police vehicles
- Recording or remembering details
- Exercise of police powers
- Sitting on boards or project teams
- Liaising with partner organisations

This may require liaison with other partner organisations and community groups. Again, this will ensure that individuals have what they need in every aspect of their job.

Useful Contacts and further advice

For further advice on disability issues, please contact People Services and ask for your local HR Advisor. You can also speak to the Occupational Health Unit.

Organisation	Contact details	Services
Disability Employment Advisor, Jobcentre Plus	Jobcentre Plus	▪ Advice on disability issues in the workplace ▪ 'Access to work' funding for reasonable adjustments
Access to Work	Telephone: 0800 169 0154 **Only on phone**	▪ Advice on disability issues in the workplace ▪ 'Access to work' funding for reasonable adjustments
Equalities and Human Rights Commission	Telephone 020 3117 0235 (non helpline calls only) Fax 0203 117 0237 info@equalityhumanrights.com www.equalityhumanrights.com	▪ Equality Act advice/helpline ▪ Code of practice – Equality Act ▪ FAQs website ▪ Conciliation service
Remploy	Telephone: 0845 155 2700 Fax: 0845 155 2701 Minicom: 0845 155 0532 Email: info@remploy.co.uk	▪ Support workers to assist employers and individuals ▪ Retention advice ▪ Return to work advice ▪ Equality Act advice

British Council of Disabled People	Tel: 01332 295551 Fax: 01332 295580 Minicom: 01332 295581 E-mail: services@bcodp.org.uk	▪ Transcription service ▪ Training ▪ Consultancy
National Disabled Police Association (Met Police)	Tel: 0207 321 (4) 8717 Fax: 0207 321 8716 Website: Disabled	▪ Support network ▪ Sharing good practice
The Disability equipment Register	Tel: 01454 318818 E-mail: disabreg@blueyonder.co.uk Website: Disability Equipment Service	▪ Nationwide service to buy and sell used disability equipment directly from or to other users
Disability Rights UK	Website: Disability Rights UK Tel: 0330 995 0400 Email: enquiries@disabilityrightsuk.org	▪ Advice, support and general information

Legal Framework and National Guidance

Equality Act 2010

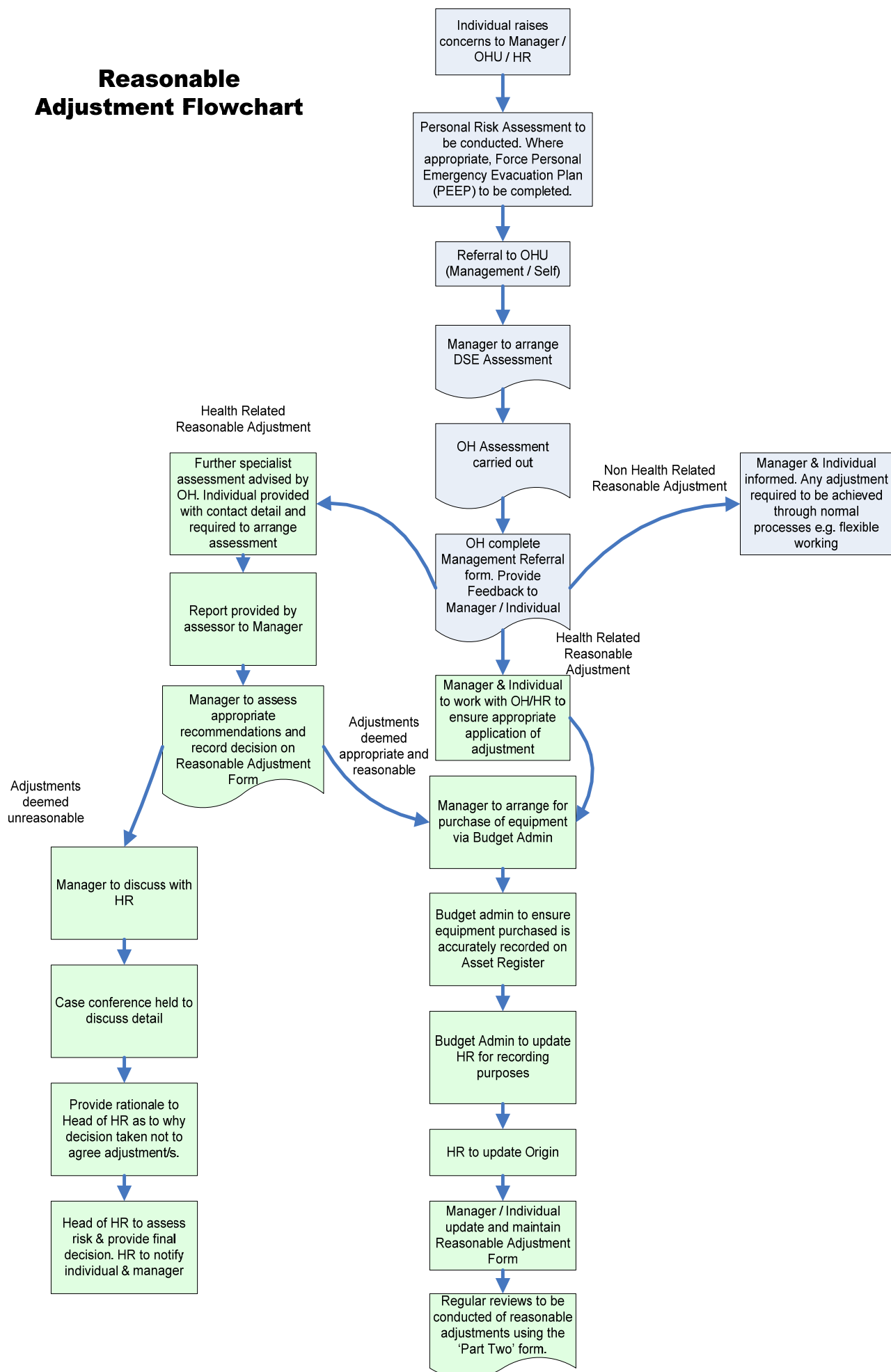
Data Protection Act 2018

Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

General Data Protection Regulation (2016/679 EU)

Employment statutory code of practice

Reasonable Adjustment Flowchart



DOCUMENT ADMINISTRATION

Ownership:

Department Responsible: Equality, Diversity & Inclusion (EDI) Team
Policy Owner/Author: Director of People and Change / Jonathan FREEGARD
Technical Author(s): Inspector Ben Huggins / EDI Team
Senior Officer/Manager Sponsor: Director of People & Change

Revision History:

Revision Date	Version	Summary of Changes
04.12.2018	1.0	Religion Belief and Cultural Awareness Policy – Religious Observance first paragraph line added re suitable space and religious observance.
02.06.2020	2.0	Scheduled Review – Minor changes made

Approvals:

This document requires the following approvals:

Name & Title	Date of Approval	Version
Force Policy Officer	30.06.2020	2.0
Inspector Ben HUGGINS (Head of Equality, Diversity & Inclusion)	23.06.2020	2.0
JNCC	23.10.2018 (via consultation process)	1.0

Distribution:

This document has been distributed via:

Name & Title	Date of Issue	Version
E-Brief		
Email to relevant affected Staff/Officers		
Other: (state method here)		

Diversity Impact Assessment:

Has a DIA been completed? If no, please indicate the date by which it will be completed. If yes, please send a copy of the DIA with the policy to the Force Policy Officer.	☒ Yes ☐ No Date:
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Consultation:

List below who you have consulted with on this policy (incl. committees, groups, etc):

Name & Title	Date Consulted	Version
Office of the Police and Crime Commissioner	27.09.2018	0.3
UNISON / Wiltshire Police Federation	27.09.2018	0.3
Wiltshire Ethnic Police Association (WEPA)	27.09.2018	0.3
Positive Action & Equality and Diversity Development Officers	27.09.2018	0.3
Stonewall	27.09.2018	0.3

Implications of the Policy:

Training Requirements

There are no additional training requirements

IT Infrastructure

No additional IT infrastructure required.

[Table of Contents](#)