

WILTSHIRE POLICE



Force Disclosure Unit
Police Headquarters
London Road
DEVIZES
Wiltshire
SN10 2DN

Date: 16th October 2024

Ref: FOI 2024/877

Dear,

I write in connection with your request for information dated 2nd October 2024 concerning the Equality Impact Assessment for the Transgender and the Workplace policy.

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.

Your request for information has now been considered and after having consulted our Force Policy Officer – I am now able to respond as follows.

You wrote:

In relation to your document Equal Opportunities Policies & Procedures and the Transgender and the Workplace policy within, please can you supply a copy of the associated Equality Impact Assessment for the Transgender and the Workplace policy.

Our response:

A separate DIA (Diversity Impact Assessment or EIA (Equality Impact Assessment) as we now call them) was not carried out for the Transgender and the Workplace Policy. A DIA was completed for the Equal Opportunities Policies & Procedures as that covered all the policies contained within that document.

A copy of the DIA has been provided below.

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Wiltshire Police Diversity Impact Analysis

Name of Sponsor	Sarah Harding
Name of Author	Jonathan Freegard
Description of proposal being analysed	Equal opportunities policy
Date DIA started	October 2018
Date DIA finished	Ongoing & subject to review

This Diversity Impact Analysis is being undertaken as a result of:

- A new or updated policy or procedure.
- Any business process including operational and managerial decisions
- A result of organisational change

Note – For ease of use of this document , we will refer to all of the above as “proposal”

DIA Screening Template

The general duty is set out in section 149 of the Equality Act 2010. In summary, those subject to the Equality Duty must have **DUE REGARD** to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- Foster good relations between different groups.

Authors have a statutory requirement to have **DUE REGARD** to the relevant protected characteristics shown below, whilst taking a common sense approach

- age
- disability
- gender reassignment
- marriage & civil partnership*
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Does this proposal have a direct impact on people who:	a) Are any part of the Police workforce (including volunteers)?	YES
	b) reside in any part of England and Wales	NO
If NO to both questions	<i>Explain why and give rational</i> No Further Action and Return to Sponsor for Authorisation	

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If Yes to either question	Continue through to Full DIA	

Wiltshire Police Full Diversity Impact Analysis

1 What's it about?

Refer to equality duties

What is the proposal? What outcomes/benefits are you hoping to achieve?

Wiltshire Police is committed to the principles of equality, diversity and inclusion and will always strive to become an employer of choice.

Currently there are numerous, separate policies and procedures, that cover aspects of the due regard we as an employer make for protected characteristics under the Equality Act.

The intention is to update and then bring these policies together in one Equal Opportunities policy. The benefits for colleagues and the public is a single document that clearly outlines Wiltshire Police's approach to all considerations under the Equality Act.

We believe by having the policies combined that we are shown to be taking an inclusive approach toward all protected characteristics.

Who's it for?

Wiltshire Police colleagues, volunteers, contractors and the public.

There is specific guidance for employees and for line managers that is referenced throughout the document in the relevant sections.

How will this proposal meet the equality duties?

There is no evidence or feedback to suggest that this proposal will not meet our duty under the Equality Act.

This policy and it's purpose is predicated on removing barriers and improving conditions for all persons for all protected characteristics.

Where this is not realised the policy will be reviewed and amended accordingly. It is also intended that this policy is a driver for change where improvements in the working environment or working practice falls short of the high standards Wiltshire Police expects of itself.

What are the barriers to meeting this potential?

None identified. This policy will be updated in accordance to any changes in legislation, best practice or guidance in respect of equal opportunities.

2 Whose using it?

Refer to equality groups

What data/evidence do you have about who is or could be affected (e.g. equality monitoring, customer feedback, current service use, national/regional/local trends)?

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This policy aims to ensure due regard for all persons and all protected characteristics. As such it potentially affects anyone employed, volunteering, contracted for/or by Wiltshire Police, as well as all persons accessing the services of Wiltshire Police.

How can you involve your customers in developing the proposal?

Full consultation with UNISON, Wiltshire Police Federation, OPCC, Stonewall, Positive Action and the Black Police Association has been completed.

Independent advisory groups (IAGs) will be utilised in the review period of this policy.

Who is missing? Do you need to fill any gaps in your data? (pause DIA if necessary)

IAGs will be utilised in the review period of this policy.

3 Impact

Refer to dimensions of equality and equality groups

Show consideration of: age, disability, sex, transgender, marriage/civil partnership, maternity/pregnancy, race, religion/belief, sexual orientation and if appropriate: financial economic status, homelessness, political view

Using the information in parts 1 & 2 does the proposal:

- a) **Create an adverse impact which may affect some groups or individuals. Is it clear what this is? How can this be mitigated or justified?**

None. The policy is predicated on the removal of barriers for all persons and all protected characteristics.

What can be done to change this impact?

Full consultation has been conducted to ensure the policy delivers on it's premise.

- b) **Create benefit for a particular group. Is it clear what this is? Can you maximise the benefits for other groups?**

This policy intends to remove all barriers to employment and engagement with Wiltshire Police relating to all protected characteristics. Guidance concerning persons with specific protected characteristics are included within the policy. E.g. reasonable adjustments for persons with disability.

Does further consultation need to be done? How will assumptions made in this Analysis be tested?

It is anticipated that this policy will be referenced for guidance in respect of real cases. A review period will be set up in 12 months time to ensure the policy remains up to date and relevant in relation to legislation, best practice and guidance and to account for any feedback from real cases.

IAGs will be asked for their view on the policy in relation to access to Wiltshire Police services and routes to employment with Wiltshire Police.

The diversity of our workforce will illustrate if there are any persisting barriers that could inform any amendment or review of this policy.

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4 So what?

[Link to business planning process](#)

What changes have you made in the course of this DIA?

None.

What will you do now and what will be included in future planning?

This policy will be reviewed in 12 months.

When will this be reviewed?

12 months (November 2019).

How will success be measured?

Quantitative and qualitative feedback from HR, OH, positive action and other relevant departments.

Feedback from IAGs

Diversity and demographics of the workforce

For the record

Name of person leading this DIA: Jonathan Freegard

Date completed: 10.10.2018

Names of people involved in consideration of impact

Name of director signing DIA

Date signed

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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 offers a re-examination of your case under its review procedure.



Force Disclosure Unit

Wiltshire Police HQ, London Road, Devizes, Wiltshire SN10 2DN

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Wiltshire Police, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing to the:

Force Disclosure Unit
Wiltshire Police Headquarters,
London Road, Devizes,
Wiltshire,
SN10 2DN

Email at disclosure@wiltshire.police.uk.

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Force Disclosure Unit within 20 working days of the Force's response to the original FOI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing to include confirmation of the reasons for the review. The review will be conducted by another Decision Maker, who is independent from the original Decision Maker. The Force Disclosure Unit will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to 40 working days.

The Independent Decision Maker will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable.

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The review enables a re-evaluation of the case, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision Maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review, they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545 700

Fax: 01625 524 510

Email: mail@ico.gsi.gov.uk

Website : <https://ico.org.uk/global/contact-us/>