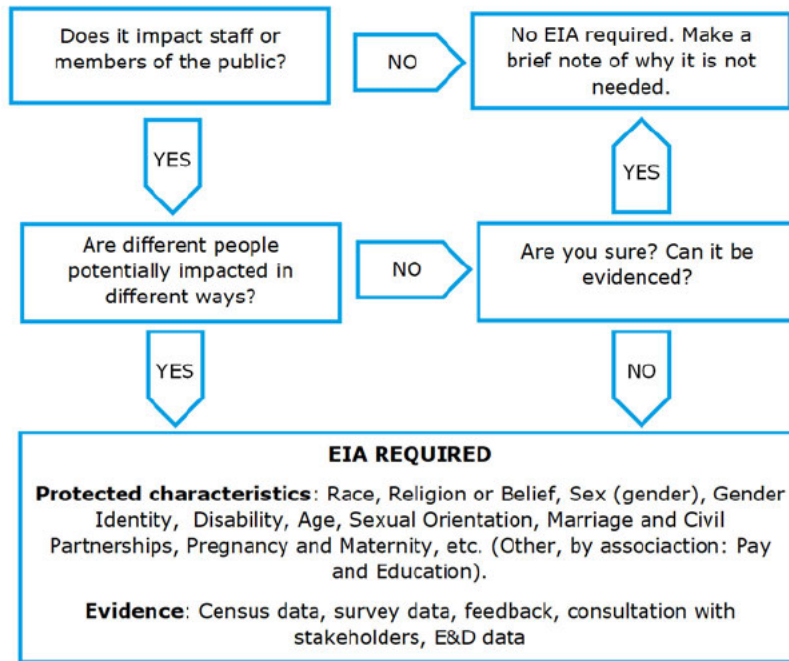


Equality Impact Assessment Template (EIA)

Please consider the below flowchart before starting your assessment. All public bodies must pay 'due regard' to the Protected Characteristics detailed within the Equality Act 2010.



Name of the policy, procedure or business area:	Supporting our Trans Employees
Name of the person carrying out the Equality Impact Assessment:	FOI s40 exemption applied
Role of the person carrying out the Equality Impact Assessment:	Equality, Diversity and Welsh Language Manager

1. Purpose

1.1 What are the aims of the policy, procedure or activity and how do they fit in with the wider aims of the organisation?	<p>The aim of this policy is to provide a clear and consistent framework for the employment and support of Dyfed-Powys Police employees and applicants who identify as Trans. It is intended to provide clear and undisputable direction in terms of the Force's approach to matters such as sickness, the changing of records and the searching of people in custody.</p> <p>The policy fits in with the wider aim of the organisation to be an inclusive employer who is supportive of difference, and ensures that there is adequate provision in place to</p>
--	---

	prevent the discrimination of Trans people in the workplace
1.2 What are the motivators or driving forces in the development of this policy, procedure or activity?	<p>In 2017, the Force launched its commitment to become a Trans Friendly Organisation. Part of this commitment was to ensure that we had an inclusive policy in place which reflected the provision which would be made for Trans people in the workplace – either those who identify as Trans on entering the workplace or those who transition during employment.</p> <p>And then there's the Equality Act 2010 and our Public Sector Equality Duty which requires Public Bodies, in the exercise of their functions, to have due regard to the need to:</p> <ol style="list-style-type: none"> i. Eliminated unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010; ii. Advance equality of opportunity between people who share a protected characteristic and those who do not; and <p>Foster good relations between people who share a protected characteristic and those who do not.</p>

2. Assessment

To assess the impact that the policy, procedure or activity has or is likely to have on a person, it is important to look at all the data and information available to you. It may be necessary to obtain further information through consultation, which should also be included.

You are looking for bias that can occur when there are significant differences between groups of people in the way the policy, procedure or activity impacts them, in respect of Protected Characteristics (age, sex, disability, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief).

In carrying out this assessment, it is suggested that you consider:

- **Data in relation to the personal diversity data** which is relevant to the policy. E.g., if the policy relates to service delivery, then you may need to look at CENSUS data, and any personal diversity data we hold in relation to people accessing those services.
- **Grievance data** – it may identify issues which may need addressing through the equality impact assessment e.g., complaints relating to accessibility for wheelchair users in custody, will need to be addressed through the equality impact assessment when reviewing the custody procedure document.
- **Any research available in relation to inequality surrounding the policy matter** – this may include HMIC reports, Equality and Human Right Commission reports etc. E.g., there are several reports which highlight inequality around stop and search, and the diversity of police officers which could be taken into consideration in drafting relevant equality impact assessments.

- **Consultation with diverse groups including our diversity champions, IAG members and staff support networks** - this would provide external challenge to the equality impact assessment and ensure that the opinions of our diverse communities are considered.
- **Any survey data which exists relating to this matter.**
- **Any other individuals/groups that you think could assist you** – with a direct link to the matter.

A selection of data which may be useful to you can be found on the [Equality and Diversity intranet page](#). Should you require advice as to what information/data you need to consider in completing this EIA then please do not hesitate to contact the Equality and Diversity Manager via Teams.

Please list any data/consultation/research you have considered in undertaking this assessment:

- **Stonewall Guidance** – Trans guidance for the policing sector- An Overview, Guidance for the individual, Guidance for the manager. Stonewall has also been consulted with regards to the specific provisions of this policy.
- **Cheshire Constabulary**
- **Natural Resources Wales**
- **Workforce data** – At present, we do not collate data from our workforce in relation to Gender Identity, and whether or not staff and officers identity as Trans. This is due to change imminently, which will hopefully mean that we are in a better position to identify disparity, as well as any issues, which our Trans workforce may face.
- **Consultation with internal Stakeholders** – Consultation has been undertaken with HR, Learning and Development, UNISON, Police Federation, HR BSU, Vetting, Legal, Custody Lead and our LGBT Support Network.
- **NPCC Guidance** – It's worth noting that the amended version is as a result of the NPCC's decision to remove their operational guidance.
- **PSED** - [Public sector equality duty | Dyfed-Powys Police](#)
- **LGBT+ SSN Ally Scheme**
- **Gender Identity Training**
- **SSN Roadshows**
- **Pronouns** - [Add Your Pronouns - Now Available in Microsoft 365! | DPPi2](#)

All comments received were considered and the policy was amended accordingly. Whilst comments were received with regards to the content of the policy, no concerns were raised with regards to possible adverse impacts of the policy on certain groups of people.

Detail the result of your assessment in the below graph:

You need to note any findings here. Has your research identified any negative or disproportionate impact on certain groups? Have we received complaints from certain groups of people in relation to the policy, procedure or activity? Have the IAG members raised any concerns? Detail any such findings in the below graph.

Could the policy, procedure or activity have a negative disproportionate impact on people who share this protected characteristic?	
2.1 Age (children, young people (17-25), older people or groups, e.g., over 55's)	N/A
2.2 Disability (seen or unseen physical, cognitive, hearing/visual impairment, mental health issues or learning difficulties)	N/A
2.3 Gender Reassignment (Individuals, both staff and public, who are transitioning or have transitioned from their biological sex at birth, non- binary, or gender fluid)	<p>This policy is intended to have a positive impact on people who are going through, or have gone through the process of gender reassignment, or people who are non-binary. It is intended to remove any uncertainty with regards to the provision which will be made for them, and therefore it is not anticipated that Trans people will be subject to a disproportionate negative impact.</p> <p>The application of this policy will however be reviewed on a case by case basis to ensure that there are no negative disproportionate impacts being experienced by individuals.</p>
2.4 Marriage and Civil Partnership (employment discrimination)	N/A
2.5 Pregnancy and Maternity (pregnancy period and the time absent from work before and after the birth, including adoption, fostering and baby-loss)	N/A
2.6 Race (people defined by their colour, nationality, including citizenship, ethnic or national origins)	N/A

2.7 Religion or belief (any religion, including no religion, any belief – includes religious and philosophical beliefs, no beliefs)	N/A
2.8 Sex (Consider Male, Female, Intersex – biological sex assigned at birth)	<p>This policy is intended to have a positive impact on people who are going through, or have gone through the process of gender reassignment, or people who are non-binary. It is intended to remove any uncertainty with regards to the provision which will be made for them, and therefore it is not anticipated that any person of any sex will be subject to a disproportionate negative impact.</p> <p>The application of this policy will however be reviewed on a case by case basis to ensure that there are no negative disproportionate impacts being experienced by individuals.</p>
2.9 Sexual Orientation (a person's sexual or romantic attraction to other people, or lack thereof)	N/A

The Socio-Economic Duty states that: “An authority to which this section applies must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.”

2.10 Pay (lower/higher pay within communities, employment status, being on benefits, unable to work)	N/A
2.11 Education (no education, low educational achievement, high educational achievement)	N/A

In accordance with the Welsh Language Standards, the following considerations also need to be made in relation to the Welsh Language:

<p>2.12 Evidence your considerations on how the policy decision would have positive effects, or increased positive effects, on — (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>	<p>There is no evidence to suggest that this policy decision would have positive effect on the ability of someone to use the Welsh language however should an individual wish to conduct their memorandum of understanding meetings through the medium of Welsh then they will be entitled to do so.</p> <p>The Policy itself will be made available to staff and officers through the medium of Welsh.</p>
<p>2.13 Evidence your considerations on how the policy decision would NOT have adverse effects, or how it would have decreased adverse effects, on — (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>	<p>As above.</p>

3. Action plan to reduce identified impact

Where a negative or disproportionate impact has been identified, then we need to be taking steps to reduce or eliminate this impact through making relevant changes to the policy, procedure or activity.

Where it is considered that the policy, procedure or activity causing the impact is justifiable, then the reasons for this conclusion must be explained clearly.

<p>Identified impact:</p>	
----------------------------------	--

Action proposed:	
N.B. Where it is considered that the impact is justified, then the reasons for this should be set out clearly.	
Completion date:	
Review date:	
EIA approved by:	
Date of Approval:	

**copy and paste the above table as many times as necessary, depending on the number of 'impacts' identified)

Please submit your completed EIA with your draft policy to the Policy Officer for review. Policies are subject to final approval via the force Governance structure for your business area prior to publication.