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Equality Impact Assessment

	Page
Preliminary Screening	4
Statistics & Research	5
Gathering Evidence through Community Engagement	11
Assessment & Analysis	14
Action Plan	39

 Home Office
EQUALITY IMPACT ASSESSMENT
Police Pensions and Retirement Policy Section
Police Reform and Resources Directorate
Police Finance and Pensions Unit

PRELIMINARY SCREENING

Date of Screening	October 2007
Name of Policy Writer	Fazeelat Saleem/John Gilbert
Director General	Moira Wallace

Name of Policy		2006 Police Compulsory Retirement Ages
	x	This is an existing policy

Policy Aims, Objectives & Projected Outcomes

The aim of the new police Compulsory Retirement Ages (CRAs) is to improve workforce management and respond to the changing nature of police duties. The new CRAs promote effective management of the police through sustaining employment based on individual contribution to the efficiency of the force in performing operational duties. An important consideration is the gruelling shift pattern and the wear and tear of operational shifts that officers are required to perform as part of the service.

In October 2006 Employment Equality (Age) Regulations 2006 were introduced, benchmarking the national retirement age for employees at 65 years. Although police officers are not covered by these regulations, since they are not employees, it was necessary that the police retirement ages should comply with age discrimination law by being objectively justifiable. Previous CRAs of 55 for constables and sergeants, 60 for the ranks of inspector to chief superintendent, and 65 for chief officer ranks, were reviewed to assess whether these retirement ages, which had remained unaltered for over 50 years, were still justified. It was found that a retirement age of 55 could no longer be objectively justified in view of the improvements in fitness levels at that age over the last decades.

A higher CRA for police officers should encourage the recruitment, development, and retention of late joiners and those who have taken a career break, amongst other things. It should also maintain expertise within the force, and encourage diversity. However there are countervailing arguments in that the nature of policing has, if anything, become more physically demanding, with a stronger emphasis on community based policing, a continued need to respond to constantly changing crime patterns, and an increased risk of facing confrontational situations.

Following extensive consultation with the Police Negotiating Board (PNB), legal advisers and Force Medical Advisers (FMAs), it was concluded that revised CRAs should be set at 60 years for the ranks of constable to chief inspector, and 65 for superintendents, chief superintendents and chief officer ranks. They are not absolute limits since it is possible for service to be extended beyond the new CRA in an individual case where appropriate. The objective of this EIA is to identify and quality assure the impact of the new CRAs on different identity groups, inside and outside the police service, with particular emphasis on views from the wider community, and to highlight any

potential challenges to them as well as any need for further review.

Will the policy have an impact on national or local people/staff?	YES
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy	YES
Are there any aspects of the policy that could contribute to equality or inequality?	YES
Could the aims of the policy be in conflict with equal opportunity, elimination of discrimination, promotion of good relations?	YES
If this is an amendment of an existing policy, was the original policy impact assessed?	YES

FULL IMPACT ASSESSMENT

STATISTICS & RESEARCH

What relevant quantitative & qualitative data do you have in relation to this policy?

Please site any quantitative (e.g. statistical research) and qualitative evidence (monitoring data, complaints, satisfaction surveys, focus groups, questionnaires, meetings, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy area.

Equality Target Areas	<p>How does the data identify potential or known positive impacts?</p> <p>How does the data identify any potential or known adverse impacts?</p> <p>Sources of quantitative data:</p> <ul style="list-style-type: none"> • Data as at 14th August 2007 from returns from forces, collected by the Home Office Research, Development and Statistics; and • Figures taken from The Home Secretary's Race Employment Targets Report 2005/06.¹
Race (consider e.g. nationalities, Gypsies, Travellers, languages)	The current proportion of ethnic minority representation among police officers is 4%. The target set by the Commission for Racial Equality is 7% by 2009. (Information taken from Police Equality and Diversity Policy Team in the Home Office Police

¹ http://horizon/race_diversity/docs/2006-Race%20Equality%20Target.pdf.

	Productivity Unit).
Disability (consider social access and physical access)	No statistics available.
Gender	No statistics available The possibility of setting gender targets is under consideration by the Women In Policing Steering Group chaired by the Minister for Security, Counter-Terrorism, Crime and Policing, the Rt. Hon Tony McNulty MP. The Police Equality and Diversity Policy Team will consult Chief Constables on this issue.
Gender Identity	No statistics available.
Religion and Belief	No statistics available.
Sexual Orientation	No statistics available.
Age	No statistics available.
Ethnic minority groups	Please see information given under "Race" .
Faith groups	No statistics available.
Caring and dependent responsibilities	No statistics available.

<p>Marital status</p> <p>e.g.</p> <ul style="list-style-type: none"> • Married • Civil partnership • Partnership (other) • Widow / widower, surviving civil partner / partner • Divorced, separated • Single • Other 	<p>No statistics available.</p>
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What research have you considered commissioning to fill any data gaps?

For example, you may need to ensure quantitative & qualitative data groups include stakeholders with respect to this policy.

N.B Include any recommendations in your action plan

An extensive consultation was held with the PNB during the development of the policy to determine the impact of the current CRAs on different identity groups within the Police Service and the service it provides to the general public. While the PNB provided valuable responses focused on the needs of the service and officers themselves the objective of this further consultation for the purpose of this EIA has been to test the views of specific identity groups and the wider community.

In consultation with internal stakeholders in the Home Office, including the Strategic Diversity Action Team (SDAT) and the Police Equality and Diversity Policy Team in PPU, the main identity groups related to higher CRAs were highlighted and a list of external stakeholders compiled to consult further for the EIA, as outlined below.

A questionnaire was formulated along with a covering letter explaining the context of the policy review, possible implications of the higher CRAs and an objective justification. This was a document highlighting the reasons for the recent review of the CRAs for police officers and the reasons for the new CRAs which came into effect on 1 October 2006. These documents were sent out to 31 organisations listed below, with an allocated period of three weeks' response time. The list of organisations contacted is at Annex A, the letter which accompanied the request for comments at Annex B, and the questionnaire itself is at Annex C. Of the 31 questionnaires sent out, nine responses were received

The data received from the following eight respondents has been recorded in this EIA report:

- British Association for Women in Policing
- Commission for Racial Equality
- Metropolitan Police Hindu Association
- Gay Police Association
- The Employers Forum on Age
- Independent Police Complaints Commission
- Police Superintendent's Association

- **Police Federation of England and Wales**

The Civil Nuclear Constabulary also replied but did not respond to the questions in a way which made the data provided suitable for inclusion in the format of this EIA report.

Who are the stakeholders, community groups, staff or customers for this policy area?

The group of stakeholders most immediately affected by this policy are:

- serving police officers;
- those managing or being managed by police officers;
- members of police staff who work with or may want to become police officers;
- former police officers who may have wanted to serve to a higher or lower age; and
- non-Home Department police forces in the UK

There are also external stakeholders such as members of the public who:

- have dealings with the police; or
- may want to join the police.

These groups can then be further broken down into different identity groups based on characteristics such as race, ethnicity and gender.

For the purposes of this assessment, the following representative organisations and umbrella groups have been consulted.

Police service and police associations:

- **Police Superintendent's Association**
- **Police Federation of England and Wales**
- National Policing Improvement Agency
- The Defence Police Federation
- Flint House - The Police Rehabilitation Centre
- Association of Chief Police Officers
- Association of Police Authorities
- HM Inspectorate of Constabulary
- British Transport Police Federation
- Police Negotiating Board
- Police Dependants' Trust Office
- **Civil Nuclear Constabulary Police Federation**
- National Association of Retired Police Officers

External organisations:

- Commission for Equality and Human Rights
- Equal Opportunities Commission
- **Independent Police Complaints Commission**
- **The Employers Forum on Age**

Identity groups:

Women:

- **British Association for Women in Policing**

Disabled people:

- The Disability Rights Commission
- National Disabled Police Association
- The United Kingdom's Disabled People's Council
- The Employers' Forum on Disability

Race and ethnic minority groups:

- **Commission for Racial Equality**
- National Black Police Association
- Metropolitan Black Police Association (MBPA)

Faith groups:

- Jewish Police Association
- The Christian Police Association
- Association of Muslim Police
- **Metropolitan Police Hindu Association**
- Metropolitan Police Sikh Association

Gay, lesbian, bisexual:

- **Gay Police Association**

Note: The organisations in bold are those from who responses to this questionnaire were received.

What are the overall trends and patterns in this qualitative & quantitative data?

The following statistics reflect the overall picture of police forces in England and Wales but do not represent the situation of individual forces. It can be noted that they highlight disproportionality in terms of the different levels of access of the various identity groups.

Quantitative trends (taken from data provided by the Police Workforce Strategy and Efficiency Section, Home Office)

1. 95% of officers are white, with 1% not stating ethnic identity
2. 4% are from ethnic minorities
3. 0.9% are female officers from BME communities and 3.0% are male officers from BME communities
4. Disabled officers make up 0.7% of the force
5. Women are 23% of the force, with men composing 77%
6. 4% of officers leave at an age of over 55 years. However, this is not split into ranks
7. 20% of officers retire having completed over 30.5 years of service. 59% of officers choose to retire between 30 and 30.5 years of service
8. - 18% of officers have completed 5-10 years of service
- 15% with 15-20 years
- 46% under 10 years
8. 62% of all officers are under the age of 40. So by the time the majority of officers reach 55 they will only have completed 25 years service

Figures are rounded to the nearest percentage unless otherwise stated. Some figures are based on returns from fewer than 43 forces, and should therefore be treated with caution.

Please list the specific equality issues that may need to be addressed through consultation (and further research)?

In order to prepare for the EIA questionnaire that was sent out to external stakeholders, consultations were held internally with the Home Office Race and Diversity Action Team for the direction and type of questions that should be posed in the questionnaire; the Police Equality and Diversity Policy Team in the Police Productivity Unit regarding statistics for race equality in the Police Service and best practice guidance for the format of EIAs; the Police Workforce Strategy and Efficiency Team in the Police Productivity Unit for quantitative data on the representation of different identity groups in the Police Service; the Police Pensions and Retirement Policy Team in the Police Finance and Pensions Unit for policy guidance and reviews of the information; and the Police Reform Unit.

The questions highlighted were relevant to the following 11 categories of identity groups researched:

- Race
- Disabled people
- Men
- Women
- Gender identity
- Religion and Faith
- Sexual orientation
- Ethnic minority groups
- Caring and dependent groups
- Age
- Marital status

There were several specific equality issues that it was considered important to address, in relation to the above identity groups. Firstly, the aim of the research was to identify precisely *how* the new CRAs would affect those officers in the above identity groups wanting to join the police service, those already in the police service, and those in the wider community. This way, the assessment could obtain some valuable *qualitative* data to supplement the purely *quantitative* data outlined above. In addition, it was considered important to consider the potential impact on the identity groups if the CRAs had been higher or lower than those ultimately chosen. A further issue that needed to be explored was the extent to which the new CRAs meet the aims and needs of a range of identity groups, and whether the policy could be improved in the light of findings.

Following consultation the Race and Diversity Action Team provided the following advice in order to fill any information gaps evident in the EIA:

- To bear in mind the role of the Home Office as a service provider/employer and as a public authority
- To keep questions open and straightforward
- To request the respondent to provide examples where appropriate
- To ensure that a background briefing suggests areas that people might want to comment on.
- That during consultation information should be gathered on the profile of all 'Police

staff 'and those affected by the policy. (*Note: the CRAs apply only to police officers, not to police staff*)

Additionally, it was underlined that the questions (please see adjoining questionnaire) should be framed in such a way that responses received can be used to make an accurate assessment of the true impact on organisations and groups consulted. However, this was difficult to do in a measured fashion due to the limited number of replies.

GATHERING EVIDENCE THROUGH COMMUNITY ENGAGEMENT

INTERNAL STAKEHOLDER ENGAGEMENT: Consulting & involving Other Government Departments, Staff, Agencies & NDPBs

Does this policy affect the experiences of staff? How? What are their concerns?

Staff

This policy has an impact on all police officers. The targeted audience of the consultation were identity groups in the community, specified by the categories in this EIA template. The following staff associations and groups associated with the Police Service provided targeted responses to the EIA questionnaire:

- Association of Police Authorities (APA)
- Police Negotiating Board (PNB)
- Association of Chief Police Officers (ACPO)
- Police Federation of England and Wales
- Superintendents Association of England and Wales
- British Association for Women in Policing
- Gay Police Association
- Metropolitan Hindu Police Association
- Employers Forum on Age
- Independent Police Complaints Commission

How have you consulted, engaged and involved internal stakeholders in considering the impact of this proposal on other public policies and services?

For example your policy may affect access to housing, education, health, employment services.

Consultations were held with the Home Office in 2006 for the impact of higher CRAs on police officers and immigration officers, as both have similar powers. The Department for Communities and Local Government was consulted to ascertain the impact on fire fighters. The Department for Trade and Industry (DTI) was consulted for the impact on overall government policy on age equality issues and to ensure Home Office proposals correlated with wider Government policy objectives.

The debate showed that the case for higher CRAs for the police was balanced by counter-arguments. Thus while the constituent organisations in the Police Negotiating Board were generally in favour of raising the CRAs as proposed by the Home Office, some organisations argued for retaining age 55 as the CRA for constables and sergeants. It was therefore imperative for the Home Office to set new CRAs which were objectively justified.

What positive and adverse impacts were identified by your internal consultees? Did they provide any examples?

Following consultation with the Police Negotiating Board, the following were pointed out under the previous CRAs:

POSITIVE impact:

Following consultation with the PNB, three positive impacts were highlighted branching from the previous CRAs. They protected the officers themselves against the increased risk of injury; protected younger officers who may have to work longer hours under higher CRAs; and assisted management in maintaining an operationally resilient force.

ADVERSE impact:

Any CRA might restrict the retention of skilled and experienced officers. A CRA creates scope for challenge since it could affect the interests of identity groups. Also, whatever CRA is used it may be difficult to assert with total confidence that it has been pinpointed accurately what a particular CRA should be.

Feedback the results of this internal consultation and use it as a basis for work on external consultation

EXTERNAL CONSULTATION & INVOLVEMENT

<p>How did your engagement exercise highlight positive and negative impacts on different communities? This section has been used to provide a broad overview of the findings of the research exercise.</p>	
<p>Voluntary Organisations</p>	<p>Not available</p>
<p>Race</p>	<p>The key points raised were that whilst on the one hand higher CRAs would lead to a decrease in diversity in the senior ranks as white male officers are retained, there would also be a greater opportunity, due to an increase in the overall possible length of service, for those of BME communities to climb to more senior ranks.</p>
<p>Faith</p>	<p>The feedback for faith was of a similar nature to that obtained for race. A similar adverse impact applies as that of the above, as a possible retention of senior officers may prevent a broadening of the faith spectrum amongst the force. However it has also been noted that the higher CRAs should promote diversity through more effective monitoring.</p>
<p>Officers affected by illness or injury</p>	<p>Whilst an increased retirement age is a way to enable those officers affected by illness to recover, there are adverse impacts including the possibility that they may encounter pressure to retire early. This underlines the importance of attracting more disabled officers to the police service to create a greater understanding in the service of the contribution that can be made by them.</p>
<p>Gender</p>	<p>Men</p> <p>As a large proportion of officers in the force based on above statistics are men (77%), it is natural that they are, as an identity group, the most affected. However, the question of gender is interlinked with other identity groups, particularly age and race. For example, with an increased CRA, older men may be encouraged to join the police service whilst also ageing the face of the service.</p>

	Women	<p>The research responses pointed out that women often have the most caring and dependent responsibilities, and would therefore be impacted considerably by higher CRAs. This is because those with such responsibilities will have increased opportunities for part time work and career breaks and still obtain the required years' service for a full pension before they are retired by the CRA. On the other hand, retention of senior male officers at the top may hamper the progression of female officers to similarly senior ranks.</p>
Gender Identity	<p>No major impact was foreseen on the gender identity group.</p>	
Sexual Orientation	<p>No major impact was foreseen on this group.</p>	
Age	<p>It was highlighted that the focus of the EIA, and the corresponding policy, was on age. However, it is important to note that the impact on different age groups was the first to be underlined by those consulted. On the one hand, higher CRAs allow older officers to remain in duty for longer, but this may be juxtaposed by a decrease in the recruitment age of new officers from 18.5 years to 18 years.</p>	
Caring and dependent responsibilities	<p>Following consultation, it was found that those with caring and dependent responsibilities would benefit most from increased time in service, as it would allow them to accommodate caring responsibilities alongside work responsibilities, and still manage to complete their required length of service. On the other hand, they may also be questioned on their commitment, due to time taken out of service. It was pointed out by the Police Equality and Diversity Policy Team that caring and dependent responsibilities go beyond those of childcare, as there are often caring needs at the other end of the scale including aged and parental care, and this is important to recognise.</p>	

Feedback the results of your community engagement (i.e. involvement and consultation) to all participants including internal and external stakeholders

ASSESSMENT & ANALYSIS

Identity Group	Does the EIA show a potential for differential impact on any group(s) if this proposal is introduced? If Yes, state briefly whether impact is adverse or positive and in what equality areas.		
	Positive	Adverse	Action taken or to be taken
Race	<p>A higher CRA should help to make the police service more attractive to BME recruits and also help their progress further up the ranks.</p> <p>The consistent monitoring of impacts will promote equality of opportunity into the Police Service (Commission for Racial Equality).</p>	<p>Older age bands contain proportionately more white officers and fewer ethnic minority officers, than those in younger age bands. The benefit will therefore be unequally distributed in race terms, though the differential will diminish over time as today's younger (and more ethnically diverse) officers reach their 50s.</p> <p>If older officers are</p>	<p>The 10 year Race Equality Employment targets (relating to the recruitment, retention and progression of Black and Minority Ethnic (BME) officers and staff) were introduced in 1999 to help the service to achieve the overall aim of establishing workforces that are culturally diverse and representative of their communities. A national target of 7% was set for the Police Service, to be achieved by 2009. Local targets were also set for each Force based on the local minority ethnic population of each force area.</p> <p>Although a number of initiatives have been undertaken, the proportion of black and minority ethnic (BME) police officers has been increasing at a slower rate, from 2% to 3.7% between 1999 and 2006. (Current data as at 31 March 2007 will be published in Home Secretary's Race Equality Employment Targets Annual Report, due December). The Home Office will continue to work with the</p>

		<p>retained fewer new officers will need to be recruited. In 2004-05, 10% of constable appointees were from ethnic minority groups and in 2005-06 the figure was 13%. Reducing recruits will constrict a group which has a much larger ethnic minority component than the proportion of officers overall, which stands at just under 4%.</p> <p>N.B. It should be noted that the Lord Chancellor's Department (now the Ministry of Justice) moved in the opposite direction in 2005, lowering the retirement age for judges (albeit only</p>	<p>National Policing Improvement Agency (NPIA) to develop robust improvement action plans to accelerate progress.</p> <p>Two project groups (now governed by the NPIA) are chaired by Doreen Lawrence and Keith Kerr (who were independent members of the former Lawrence Steering Group) to look at what is working at a local level in relation to trust, confidence, retention and progression and what more can be done to improve these areas. The group chairs report back to the Home Office Minister of State for Security, Counter-Terrorism, Crime & Policing, the Rt. Hon Tony McNulty MP.</p> <p>There are positive action recruitment drives currently being undertaken. Guidance to support forces includes the 'Dismantling Barriers' initiative; 'Breaking Through' National Action Plan; Positive Action Events Tool Kit; and 'It works...The Operational Benefits of Diversity for the Police Service'.</p> <p>Some forces are employing full time BME recruitment officers, organising mock assessments centres, promoting the service at community festivals and events, conference and seminars involving the BME communities, and school presentations. In January 2007 "additional criteria" guidance was issued to forces on police officer</p>
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		<p>to 70) with the express aim of increasing diversity, given that a much larger proportion of eligible barristers and solicitors are women or from ethnic minority groups than was formerly the case (Commission for Racial Equality).</p>	<p>recruitment and appointment. Under this forces can consider using additional criteria based on operationally valuable skills such as knowledge of languages and community knowledge as a means of accelerating the appointment of candidates with such skills, provided they first pass the national assessment centre.</p> <p>The Home Office provides grant-in-aid funding to national Diversity Staff Support Associations such as the National Black Police Association (NBPA) to carry out projects that support Home Office objectives to increase trust and confidence of diverse communities and improve recruitment, retention and progression of underrepresented groups.</p>
<p>Disabled People</p>	<p>In cases of illness or injury, the increased retirement age means affected officers can return to work having made a complete recovery, as opposed to feeling pressured to return to work earlier due to the time constraints involved in attaining a full pension (Police Federation).</p>	<p>New CRAs are not likely to significantly encourage more disabled people to join the Police Service. Disabled officers in service may become victims of discrimination and may encounter more pressure to</p>	<p>Some forces are signed up to the two tick scheme. Job advertisements and application forms carry the disability (two ticks) symbol. This means that minimum criteria are outlined in the job advertisement, and a detailed job specification and notes for candidates are sent with the application form. The notes for candidates will include an explanation of the Guaranteed Interview Scheme (GIS) and a GIS application form. Candidates who wish to apply under the GIS scheme are asked to complete this form to declare their disability. As long as the applicant meets the minimum</p>

		<p>'retire early' by those who consider themselves more able (Police Federation).</p> <p>Under Regulation A20 of the Police Pensions Regulations 1987 it is possible to compulsorily retire officers where he or she is permanently disabled for the performance of duty. The CRA could have a disproportionate adverse impact on older officers who may develop a disability (Police Superintendents Association).</p>	<p>published criteria, they will be invited for interview without being subject to further sifting criteria. Those being interviewed under GIS are invited for interview in addition to those who are successful at any secondary sift.</p> <p>This is a tool for the recruitment of those with disabilities to the Police Service.</p> <p>There are also certain criteria that have been outlined as best practice measures to be taken by the Police Service to accommodate those with disabilities. These include reasonable adjustments, which remove any potential disadvantage that could be experienced by a disabled person because of their disability. Examples of these include altering premises and altering training and/or working hours. Where adjustments are not made, the employer must have a material and substantial reason for not doing so, and justify reasons.</p> <p>The Home Office Police Equality and Diversity Team is drafting and publishing guidance to forces on the lifting of the police exemption from the employment provisions of the Disability Discrimination Act 1995. They are also co-ordinating the publication of more specific supplementary guidance.</p> <p>The Disability Equality Duty has been included in the Disability Discrimination Act 2005. this</p>
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			<p>promotes disability equality, eliminating discrimination, combating harassment, promoting positive attitudes and seeking engagement and participation for disabled people. This is a best practice principle, and includes initiatives such as providing recruitment packs in large print, or electronically.</p> <p>The Home Office provides grant-in-aid funding to national Diversity Staff Support Associations such as the National Disabled Police Association (NDPA) to carry out projects that support Home Office objectives to increase trust and confidence of diverse communities and improve recruitment, retention and progression of underrepresented groups.</p> <p>Further information is available from the handbook entitled 'Disability in the Police Service'.</p>
<p>Women</p>	<p>Female composition of the Force may increase through CRAs, as there will be greater opportunity to take career breaks and rejoin the Force. This could help those</p>	<p>Progression for women and BME officers is hampered by blockages at the higher levels of the police service. Less than 2% of</p>	<p>The possibility of setting gender targets is under consideration by the Women In Policing Steering Group chaired by the Minister for Security, Counter-Terrorism, Crime and Policing, the Rt. Hon Tony McNulty MP. The Police Equality and Diversity Policy Team will consult Chief Constables on this issue.</p>

	<p>wanting a career prior to starting a family, those wishing to return to work following the establishment of a family, and those seeking promotion after a career break. It is also possible to accrue more pensionable service with part-time service following the introduction of higher CRAs.</p> <p>(Police Federation and British Association for Women in Policing).</p>	<p>ACPO posts are currently occupied by women; this will become increasingly difficult if the majority are retained (which are white men) in these positions for longer (British Association for Women in Policing).</p> <p>Women officers have traditionally had a shorter length of service than men, so that the CRA has a greater impact on women (Police Superintendents' Association).</p> <p>Women who have caring responsibilities for elderly parents etc may find a later retirement age shortens their own life expectancy, as</p>	<p>The need for gender targets should be highlighted as the number of women from ethnic minorities represented in the Police Service is significantly low, standing at 0.9%. Other health needs of women must also be taken into account, including those in the state of menopause and women suffering from severe menstrual cramps (dysmenorrhoea) (Police Federation).</p> <p>Home Office provides grant-in-aid funding to national Diversity Staff Support Associations such as the British Association of Women in Policing (BAWP) to carry out projects that support Home Office objectives to increase trust and confidence of diverse communities and improve recruitment, retention and progression of underrepresented groups.</p>
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		child care is not the only caring responsibility for women (Police Equality and Diversity Unit, Home Office).	
Men	Higher CRAs may encourage older men to join the service (Police Federation).	Higher CRAs could encourage older men to join the service, increasing the average age of male officers and changing the perception of men in the force. This may increase competition for opportunities or lead to dissatisfaction from younger recruits or those wanting a more youthful senior rank of the Police Service (Police Federation).	Higher CRAs will give men greater choice over when they retire and how much pensionable service they want to build up. Furthermore, the Flexible Working Regulations of 2002 allow men to choose their working patterns, to help in their caring and dependent responsibilities and be equal in accommodating other duties alongside work. This can be further researched in the Employment Monitoring Duty Guidance. The new CRAs may thus afford them more time to accrue years of service whilst still on a flexible basis.
Gender identity	As officers can serve longer, this may		Although there are no authoritative figures on gender identity members of the police force, it

provide opportunities to fulfil an ambition to join the service after changing gender later in life (as there is now time to have a career until a later age).

(Police Federation).

is generally accepted that the number is very limited.

Police Pension Schemes are required to recognise registered changes of gender. Raising the CRA is a step forward, but there must be an appreciation of the potential impact on trans-gender people in the job selection process – perhaps by stating that information provided will be dealt with in accordance with the Data Protection Act, section 22 of the Gender Recognition Act and with Home Office Best Practice with regards to transsexual people.

Retirement and pensions-related issues include potential discrimination in application and selection such as:

- Medical screening,
- Pensions records
- Length of service (this can identify trans more readily especially if the gender was biased)

<p>Religion and faith</p>	<p>Current CRAs enhance the monitoring and promotion of equality of opportunity for all identity groups (Metropolitan Police Hindu Association).</p> <p>As age increases, religion, faith and belief develop so that new CRAs could encourage officers with a faith based perspective to encourage community applications to the Service, increasing internal diversity and stronger police-community ties (Police Federation).</p>	<p>The correlation between ethnic minority groups and the practice of faith means that both are likely to face a similar impact (Commission for Racial Equality – see impact for Race category).</p>	<p>A National Association for Muslim Police (NAMP) was launched 11 July 2007. NAMP meet on a regular basis with the Minister for Security, Counter-Terrorism, Crime and Policing the Rt Hon Tony McNulty MP to bring up issues affecting both members of NAMP and the Police Service as a whole.</p>
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<p>Sexual orientation</p>	<p>Higher CRAs could make a police career more viable as an opportunity to fulfil the ambition to work until the retirement age. Officers who have built trust and confidence with the gay community could potentially work for longer and maintain this (Police Federation and Gay Police Association).</p>		<p>Civil partners are given equal access to police adult survivors' pensions in the PPS and NPPS. NPPS adult survivor pensions are available to opposite-sex and same-sex partners whether or not they are married or in a civil partnership.</p>
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<p>Age</p>	<p>Increased CRAs benefit constables and sergeants aged 55 – 59, and officers above those ranks aged 60 – 64, who will now have the option to retire later. This is positive on the grounds of age equality. Furthermore, if the average ages of police officers rise, and some work for longer it will increase internal expertise and alter the age structure of the police. There is consequently the potential for officers to work later in life, and for longer.</p> <p>(Commission for Racial Equality).</p> <p>Officers in the Superintending ranks will be on the 1987 Police Pension Scheme, which they could have joined at 18.5 years of age, and</p>	<p>If older officers are retained for an extra 5 years under higher CRAs, fewer new officers will need to be recruited</p> <p>(Commission for Racial Equality).</p> <p>With an increased average age, this may:</p> <ul style="list-style-type: none"> - create an image of a police service of ‘older officers’ with declining levels of responsiveness; - lead to fewer opportunities/roles for new officers to develop; - leave younger officers to fulfil the physically demanding roles, resulting in consequences for health, safety and retention; 	<p>The exit point of age 55 for constables and sergeants has been maintained so that they can continue to leave service with an immediate pension and a lump sum based on commuting up to ¼ of their pension. This is to enable officers to leave if they want to and therefore forces have only those keen to remain in the force beyond 55. There has been a change to the recruitment age of police officers which is now 18 as opposed to 18.5, encouraging younger recruits to join and therefore preventing the possibility of an ‘aged’ image of the Service.</p> <p>In order to combat the potential adverse impact on the image of the police service as appearing aged in the senior ranks, there needs to be a regular monitoring process by each force, so that accurate statistics can be recorded.</p> <p>Careful use of deployment is required to meet the needs of the force and take account of officers’ capabilities.</p>
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	<p>have accrued a full pension by the age of 48.5. They could work for up to 16.5 more years until they are compulsorily retired at 65</p> <p>(Police Superintendents' Association).</p>	<ul style="list-style-type: none">- lead to older officers coming under increasing pressure to 'retire' thanks to harassment, bullying, disciplinary action, performance and medical capability issues, with consequences for their health and safety;- lead to concerns about overall health of officers, including effects of shift working, increasing disability as they get older, and the responsibilities 'transferred' to those considered 'fit' (Police Federation).	
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<p>Ethnic minority groups</p>	<p>Higher CRAs are likely to make a policing career more attractive to ethnic minority applicants, as it allows greater time for the recruitment drives to flourish. Ethnic minority officers are likely to serve longer owing to this increased opportunity. This will help increase diversity within the Service and improve confidence within the ethnic and wider communities (Police Federation).</p>	<p>Progression for women and officers from minority groups may be hampered in the main by a concentration of white male officers at the higher levels of the service, extended by higher CRAs. (British Association for Women in Policing).</p>	<p>This is currently the only identity group for which ethnic minority recruitment targets have been established, which is 7% for 2009. Targets are monitored and progress is reported in the Home Secretary's Race Employment Targets Annual Report.</p> <p>A longer police career, due to higher CRAs, should encourage BME recruitment and retention.</p>
<p>Caring and dependent responsibilities</p>	<p>New CRAs will enable women to have a full career and take a break from the service to fulfil caring responsibilities. This will provide more flexibility to those who wish to join the Service whose caring responsibilities have hitherto prevented</p>	<p>Those with caring responsibilities who recognise the additional opportunity this presents may suffer adverse outcomes (queries about their commitment etc) from officers who remain in the</p>	<p>Action has been taken to provide greater choice for those with caring and dependent responsibilities. There are now opportunities for career breaks in public legislation, alongside part time working and flexible working hours which allow for time off as a legal right within the Police Service.</p> <p>The PPS has been reformed to give fairer treatment to part-timers. The NPPS has uniform accrual, which reduces the impact of career breaks on pension entitlements.</p>

	<p>them from doing so. Increasing diversity and tolerance within the service around those with caring responsibilities could transfer to the community and may improve understanding, trust and confidence (British Association for Women in Policing and Police Federation).</p>	<p>Service (Police Federation).</p>	
<p>Marital Status e.g.</p> <ul style="list-style-type: none"> - Married - Civil partnership - Partnership (other) - Widow, widower, surviving civil partner/partner - Divorced, separated - Single - Other 		<p>Only married couples and civil partnerships are protected by the discrimination legislation (Police Superintendents' Association).</p> <p>However, owing to long established societal norms and stereotypes, different groups may be assumed to want or need to serve for longer or</p>	<p>It seems that the point made by the Police Federation with regards to adverse outcomes experienced by those of different marital status is not upheld by the current legislation on CRAs, as higher CRAs do not substantially contribute to the decision of marital status groups to continue employment in the service. However, it is accepted that there should be monitoring of the needs of officers undertaken by individual forces to realistically assess the impact of higher CRAs on officers of differing marital status. As yet the impact is unclear</p> <p>The introduction of the NPPS included provision of lifelong pensions to nominated same-sex or opposite-sex partners.</p>

		<p>shorter lengths of time, and may suffer adverse outcomes if they opt not to comply with expectations. For instance, 'single' people may be assumed to need to continue working as they do not have a dual income, and are encouraged to do so, to the detriment of others. Steps may need to be taken to assess how the new CRAs affect particular marital status groups (Police Federation).</p>	
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What were the main findings of the engagement exercise and what weight should they carry?

The majority of the responses found the higher CRAs to be limited in negative impact and therefore a fair policy. The main points highlighted include:

Finding	Weight
<p>1. The Employers Forum on Age asks whether it should be ability or age legislation that determines the retirement of a police officer. Those officers reaching the CRA wishing to extend service can apply and undergo a physical fitness test. If they perform well in the test and have a strong record of performance in relation to their colleagues, there is the possibility for extension of contract. Thus fitness, rather than age, should be the main determinant in whether an officer remains in service. Furthermore, there should be an element of choice rather than compulsory retirement.</p> <p>2. The most significant impact appears to be on women, disabled people, married people, those with caring/dependent responsibilities and the aged in the Federated ranks. For the senior ranks, comment has been very limited though the impact has been highlighted for disabled people and those with caring and dependent responsibilities.</p> <p>3. There are claims that the current CRAs may create a concentration of white males at the top of the ranks for an extra five years, which means that the distribution will not be equal (Commission for Racial Equality).</p> <p>4. BME officers made up a proportion of 4% of the police force in 2006/07, despite a recruitment target of 7% by 2009.</p>	<p>1. The issue of fitness tests is a potentially very important one since, if valid, it undermines the idea of a CRA. It is understandable as an ideal that age should not be the reason why a police officer is or is not deemed efficient at his job. However, realistically the physical fitness of an officer is affected by age, and therefore it is legitimate to set an age beyond which the generality of officers should not attempt to serve. A CRA provides recruits and managers with an idea of how long an officer should be able to serve and also provides an explanation and justification to the public for police officers needing a lower pension age than normal.</p> <p>2. Significant. The CRAs have been raised for operational reasons to make the most effective use of officers for as long as operationally feasible. However, a welcome result of that is the potential for a longer police career which benefits these groups.</p> <p>3. & 4. It is true to an extent that higher CRAs may lengthen the service of white males in the senior ranks. However, there has been an increase of 1% in the proportion of women officers in the police force from 22% in 2005/06 to 23% in 2006/07 (this does not include <i>staff</i>), which will be supplemented by the fact that the five supplementary years will allow those of non-white male identity to enter and progress in the senior ranks. This includes both women and those of BME communities. Although this is a pertinent point, it is dependent on the recruitment procedure employed by the police service. This also applies to the representation of BME officers in the service.</p>

5. In 2005/06 the proportion of females from BME backgrounds was 0.8% and 2.9% for males. The statistics for 2006/07 show that this has increased to 0.9% for females from BME communities and 3.0% for males of the same community. It is difficult to ascertain whether the increase can be attributed to higher CRAs, which were introduced in October 2006, but it is an important consideration when analysing available information.

6. That there should be a need to address the health concerns of women in the Service e.g. menopause, dysmenorrhea (menstrual cramps)

7. That the attitudes towards identity groups within the police force have the potential to improve community relations with and between identity groups outside. Higher CRAs may widen potential for minorities to enter the force, and make it more representative and receptive to communities in the long run.

8. That the increased CRAs are not necessarily going to be taken advantage of, considering only 4% of officers remain within the police service after the age of 55. This statistic more than any other highlights that it is an option as opposed to a compulsion.

5. This is a significant point. The proportion of females from BME communities is limited, and reflects the need of a more representative force. Higher CRAs give the possibility of a longer police career which means that officers can join the police late and still get a maximum pension, which should be an added advantage in attracting and retaining members of this group, but consideration still needs to be given as to whether recruitment drives adequately attract members of this group.

6. Higher CRAs provide the opportunity for women to work for longer, and therefore make greater progress in the senior ranks. They can also take career breaks for caring and dependent responsibilities whilst in service. However, with this it is important that their needs are accommodated to support an extended working life. This includes a higher possibility for illness with age, especially with the beginning of the menopause. For younger female recruits it is important that sickness resulting from period pains is accounted for, and reasonable adjustments can be made to support them on duty. For these reasons, it is considered that this finding is of considerable weight in that it highlights the needs of women in a gender capacity, as opposed to their responsibilities.

7. As outlined above, a longer police career, due to higher CRAs, should encourage BME recruitment and retention. In the long term this has a positive impact on the relationship between the service and the public that it serves. It will also affect relations with minority communities.

8. A very important finding, this refutes claims that higher CRAs will automatically lead to an aging police service. This statistic shows that there exists a natural filtration process for those in the senior ranks. Although currently these ranks are

9. That the operation of the current police CRAs should be reviewed at the same time as the review of the application of the Default Retirement Age under the Age Regulations in 2011, highlighted by the Police Superintendents' Association.

10. That the workplace is properly equipped (with reasonable adjustments) to work to an older age for retirement

dominated by white males, recruitment targets for officers from BME communities, if adequately met, will ensure that members of these ranks become more representative of the people they serve in terms of identity and understanding.

9. This is important in weighting as it provides a target date for a review of the EIA simultaneously with legislation. As a result the two reviews will support each other in intent and function.

10. This is a weighty point directly related to higher CRAs. It is true that as age increases, there are related physical problems that arise, and it is imperative that police forces take this into account. The key will be whether adjustments are reasonable. A CRA which is objectively justified sets reasonable limits on expectations as to the extent to which adjustments can or should be made.

Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain groups of people from obtaining services, or limit their participation in any aspect of public life?

Overall the feedback received from stakeholders shows that the **actual** impact of higher CRAs is limited. However, there are areas that the stakeholders have highlighted which have the **potential** for unlawful direct or indirect discrimination, exclusion of certain groups of people from obtaining services, and limit to their participation in public life. These include the following:

1. Statistically the proportion of women has increased by 1% between 2005/06 and 2006/07. Does this indicate that the situation for women in the police force is improving? Whether the improvement can be attributed to the increased CRAs is uncertain, but it is worth considering. With initiatives being discussed to improve gender representation in the police force, this may progress more rapidly than initially anticipated.
2. The impact on the number of disabled people joining the police service has not been noticeable; in 2005/06 the number of officers reached 1,051 whilst in 2006/07 they

increased by five to 1,056. The current representation figure is 0.7%, less than any other identity group². Under Regulation A20 of the Police Pensions Regulations, it is possible to compulsorily retire officers where he or she is permanently disabled for the performance of duty. Thus the higher CRAs could have a disproportionate adverse impact on older officers who may develop a disability (**Police Superintendents' Association**)

3. It is possible that unforeseen negative outcomes of the increased CRAs on identity groups may lead to problems in the dynamics of the police service, including possible intolerance and isolation. Therefore it is imperative that the impact is regularly monitored to identify and resolve any potential for problematic impacts before they develop (**Police Federation**)

This policy is highly limited in its ability to cause unlawful direct or indirect discrimination, exclude certain groups of people from obtaining services, or limiting participation in other aspects of life. It has the potential to open recruitment to wider groups of people and therefore increase opportunities for those of different identity groups. Officers will continue to be able to leave the service at the stage at which they would have been required to retire on age grounds before the changes were made in October 2006.

How does the policy promote equality of opportunity?

It promotes equality of opportunity in the following way:

1. Women benefit considerably. They now have the option to have a family before joining or after, and to have a greater opportunity of a full police career as well, particularly if flexible working policies are fully implemented. There are an increasing number of women visible in positions of police responsibility and leadership within communities, with an increase of female police officers from 2005/06 to 2006/07 which could have a beneficial effect on the advancement of women in society more generally.
2. There are arguments that ethnic minorities may suffer an even lower level of access into the Superintending and ACPO ranks through the extended retirement age from 60 to 65 years. However, the number of Officers in the senior ranks choosing to terminate service at the age of 55 years (previous retirement age) is 99.55%. This means that the actual numbers of senior officers remaining after 55 is very small, standing at 0.45%³. There is consequently little likelihood that extended CRAs would hinder the progress of younger officers of all identity groups, but it would definitely contribute five extra years to make that progress. In the longer term this will actually mean a faster pace of progress and representation than previously, especially if recruitment targets are met.
3. There is a combined impact on ethnic minority and faith groups, as largely those of an ethnic minority correspondingly belong to heterogeneous faith groups. This means that recruitment drives and the promotion of equality for opportunity for those of BME communities will simultaneously assist the recruitment of those officers of faith groups.

² Data unverified with forces.

³ Data unverified with forces.

Point 2 is equally applicable here.

4. The extended CRAs reduce the possibility of age discrimination, as there is the opportunity for people over the age of 55 to work within the police service for an extra five years, and can apply for extended service beyond these ages depending on fitness.

How does your policy promote good relations? How does this policy make it possible for different groups to work together, build bridges between parallel communities, or remove barriers that isolate groups and individuals from engaging in civic society more generally?

Higher police CRAs promote good relations in that they allow greater opportunities to different identity groups for access into the police service, and therefore more equal representation in the police service.

The proportion of disabled and female officers and those of BME communities has increased from 2005/06. Increased interaction will lead to greater understanding and equality between identity groups. A more representative image of the police force will foster stronger relations between the Police Service and different identity groups among the general public.

However, any CRA can lead to disagreement in individual cases as to whether it is too low. The key is that the CRA remains justified objectively and is applied as fairly as possible.

How can the policy be revised or additional measures taken in order for the policy to achieve its aims without risking any adverse impact?

Although the *actual* impact of increased CRAs is positive thus far, there is some potential for important negative impacts to develop if its impact is not monitored.

From the evidence provided by consulted stakeholders, there seems to be no apparent reason to revise the policy now, as those disadvantages highlighted are outweighed by advantages. For example, there are concerns that increased police CRAs will reduce access to the senior ranks for women, those from BME communities and disabled people in the community. However, the additional five years provide greater opportunities for these groups to complete 30 years and take a career break if desired whilst also having the ability to complete the time.

Further measures are outlined in the action plan below.

Are there any gaps in knowledge or data gathering, consultation and analysis that have not been taken on board?

Please justify and explain the reason for your decision.

Yes. The British Association for Women in Policing only responded on the impact of the current CRAs on women, and the Commission for Racial Equality only responded on the impact on ethnic minority groups, not the others. The Independent Police Complaints Commission and Police Federation responded to all three questions individually, whilst the majority answered using one degree of impact to respond to all three questions.

Furthermore, it would be important to consult the following internal networks in order to fill any information gaps including a:gender, Spectrum, HODS (Home Office Disability Support Network), Home Office Women, Women and Equality Unit, Working Families and consult transgender community groups alongside the general public.

There are three specific gaps that have been highlighted by the data gathering and need further information:

- That the Home Office needs to cross reference the ethnicity and age data it holds to establish whether or not there is an unequal impact on different race groups, the size of it, and if so how long it will take to close by natural progression (**Commission for Racial Equality**).
- That trends and management decisions on CRAs should be proactively monitored by the local managers (**Metropolitan Police Hindu Association**).
- That the actual implementation of the CRAs by the police forces should also be monitored. That the selection for those officers applying for extensions beyond the CRA should be based on an independent review of each case, past precedents and

the formal views of the officers concerned (**Metropolitan Police Hindu Association**).

- It would also be important to consult transgender community groups, to add an age section to the original questionnaire and to consult the Charities Commission.

Responses which have been in the form of ticking a box indicating just the degree of impact without being accompanied by written comments cannot be used to determine whether they would exert a positive or negative influence on the identity group. This has meant that there is no certain conclusion or answer to the questions.

The comment made by the Employers Forum on Age regarding the importance of fitness being used as a determinant for police compulsory retirement ages as opposed to age has been understood. However, the idea of replacing the CRAs with fitness tests implies that there are no ages beyond which the generality of officers of a certain rank will be unable to perform police duties. We consider that there are and that it is preferable to make these ages known so that officers have an understanding of the length of career that they are likely to have in the police, and can plan for their pension provision etc. It is also not clear what the consequence of failing a fitness test would be. It would be undesirable to dismiss, say, a 35-year old for being unfit without first trying to get him or her fit again. We already have the facility of ill-health retirement with an immediate index-linked pension in the case of permanent disablement.

ENSURING ACCESS TO INFORMATION

How can you ensure that information used for this EIA is readily available in the future?

(N.B. You will need to include this in your action plan)

- It will be published and available on the Home Office Police Pensions and Retirement Policy website.
- The report will be archived with the Home Office Police Equality and Diversity Unit.
- The action plan will be submitted to the Home Office Minister for Security, Counter-Terrorism, Crime and Policing.

How will you ensure your stakeholders continue to be involved/ engaged in shaping the development/ delivery of this policy?

(N.B. You will need to include this in your action plan)

- External stakeholders will be informed of relevant future reviews and monitoring.

How will you monitor this policy to ensure that the policy delivers the equality commitments required?

(N.B. You will need to include this in your action plan)

- Feedback will be published internally as part of guidance and will be referred to in future review consultations as necessary.
- A review will be undertaken in 2011 simultaneously with a review of the Default Retirement Age in the Age Regulations.

ACTION PLAN

Recommendations	Responsibility	Actions required	Success Indicators	Target Date	What progress has been made?
<p>A) Ensure Equality Impact Assessment is made available via wide publication.</p>	<p>Police Pensions Team, PFPU, Home Office</p>	<ol style="list-style-type: none"> 1. Upload EIA onto Police Pensions outward facing website. 2. Include a link to the EIA on the Police Diversity and Equality website. 3. Email all organisations that were approached with a link to the EIA. 4. Send Police Negotiating Board final copy of EIA (Staff Side and Official Side) for information. 5. Notify Pensions Administrators of all forces on Police Pensions Administrators' Forum. 	<p>Positive responses from PNB and other external stakeholders to final EIA (e.g. at PNB meeting, or via correspondence).</p> <p>The EIA is referred to by other assessments, and is used as an example of good practice for other policies and for training purposes.</p>	<p>07/12/07</p>	<p>Final approval has been secured. Publication on target date agreed.</p> <p>Agreement reached with Police Equality and Diversity Team to use EIA for internal training courses.</p>

<p>B) Ensure forces examine the age profile of officers, especially those over the age of 50, to monitor use of CRA.</p>	<p>Individual forces.</p>	<p>1. Notify forces of need for monitoring arrangements 2. Ensure date of birth statistics are included in Annual Data Returns to Home Office each year, via the HR aggregate returns to the Home Office, or via the Home Office NMIS Data Hub when launched. 3. Encourage individual forces to examine their own data and develop</p>	<p>A yearly picture for each force of increasingly positive effects of the new CRAs on identity groups.</p>	<p>Ongoing</p>	<p>Awaiting commencement at time of publication.</p>
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<p>C) Undertake review of CRAs in line with review of Default Retirement Age in the Age Regulations</p>	<p>Home Office Police Pensions Team, in consultation with colleagues from Business, Enterprise & Regulatory Reform (BERR).</p>	<p>1. Liaise with colleagues from BERR, Legal Advisers Branch and the Government Actuary's Department in 2010 to establish timescale, scope and intention of review. 2. Undertake review of police CRAs (as set in 2006) in accordance with BERR framework. 3. Recommend to Ministers any change needed for police CRAs.</p>	<p>CRAs which accurately reflect the changing nature of the police force, and changes in the national demographic (e.g. life expectancy)</p>	<p>2011, in line with the wider review.</p>	<p>Awaiting commencement at date of publication.</p>
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Annex A: Organisations consulted

- The Disability Rights Commission
- National Disabled Police Association
- The United Kingdom's Disabled People's Council
- The Employers' Forum on Disability
- National Black Police Association
- Metropolitan Black Police Association (MBPA)
- Jewish Police Association
- The Christian Police Association
- Association of Muslim Police
- Metropolitan Police Sikh Association
- Police Dependants' Trust Office
- National Association of Retired Police Officers
- Commission for Equality and Human Rights
- Equal Opportunities Commission
- National Policing Improvement Agency
- The Defence Police Federation
- Flint House - The Police Rehabilitation Centre
- Association of Chief Police Officers
- HM Inspectorate of Constabulary
- British Transport Police Federation
- Police Negotiating Board
- Association of Police Authorities
- British Association for Women in Policing

- Commission for Racial Equality

- Gay Police Association

- The Employers Forum on Age

- Independent Police Complaints Commission

- Police Superintendent's Association

- Police Federation of England and Wales

- Civil Nuclear Constabulary



Crime Reduction and Community Safety Group
Police Finance and Pensions Unit
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Annex B

We are writing to your organisation to ask for your views on the impact that the recent change in the compulsory retirement ages (CRAs) for police officers may have, whether on the police service itself or on the public it serves.

Under the regulations governing police pensions and retirement, police officers may be compulsorily retired by their force or police authority on the grounds of their age. Under the new arrangements brought in last October, officers of the rank of Constable, Sergeant, Inspector and Chief Inspector can be compulsorily retired at the age of 60 whereas Superintendents, Chief Superintendents and Chief Officer ranks can be retired at 65.

Policy Background

The main difference between the new CRAs and those which applied before then was that Constables and Sergeants could be compulsorily retired at the age of 55, and Superintendents and Chief Superintendents at the age of 60. A chart giving full details of the old and new CRAs is attached. The previous CRAs had been in place for over 50 years, against a background of significant changes in health, life expectancy, crime, and policing over this period.

In recognition of these changes and in preparation for the introduction of the Employment Equality (Age) Regulations in October 2006, the Home Office reviewed the CRAs for police officers. The new CRAs were introduced following full consultation with the Police Negotiating Board, taking into consideration the views of Force Medical Advisors (FMAs), legal advisors and HR managers. In reviewing the previous CRAs, particular attention was given to the relationship between age, physical fitness, likelihood of injury, and the increasingly confrontational role of a police officer in performing operational duties and meeting the overall aims of the police service.

The decision to introduce different CRAs for the Federated ranks (from Constable to Chief Inspector) and the Superintending and ACPO ranks was based on a consideration of the general duties of officers in those ranks. The general duties of the Federated ranks are operational and confrontational, requiring greater physical exertion. This physical exertion is

exacerbated by other factors including changing shift patterns, being on-call and frequent and often unplanned overtime. The generality of work in the Superintending and ACPO ranks was found to be less directly operational and confrontational. Typically these officers have more structured hours, (although they too can be on-call) and therefore involve less physical exertion.

Review of Compulsory Retirement Ages

Although there was extensive consultation on the new CRAs within the statutory negotiating body for the police service, we consider that this decision would also benefit from being tested by means of an Equality Impact Assessment (EIA) conducted in the wider community. Our objective is to assess and understand the actual and possible implications of the new CRAs on the public, private and third sectors, as well as on identity groups within the police service. The EIA is a tool to enable us to consider and present relevant evidence on the effects of the new CRAs, by reviewing the impact of the policy. We hope that this research exercise will provide us with accurate feedback on the impact of the new CRAs on different groups within the police service and within wider communities.

Information required

Please find attached a questionnaire which should be used to provide information on the actual and possible impact of the new CRAs on your identity group. This information will be used to ascertain who has been affected by the changes, how, why, and to what extent. For example, how might this policy affect the needs of a mother or a disabled person in the police service and/or in the public? What would the implications be for your identity group if the ages were higher or lower? Please provide reasons for your answers.

Timetable for research exercise

The information is requested by the closing date of Tuesday 7th August. This will enable the collation of the information in time to feed into the review document. Your views on the CRAs are invaluable to this review and we would therefore be grateful if you could provide as much detail as possible in your answers.

Contacts

If you have any queries about this questionnaire, please contact Fazeelat Saleem (for wider information on the purpose of the EIA and the specific questions) on 020 7035 1893 or Fazeelat.saleem5@homeoffice.gsi.gov.uk.

Thank you for your participation.

John Gilbert
Police Finance and Pensions Unit

Annex C

Questions:

1. What do you consider the key implications of the new Compulsory Retirement Ages (CRAs) to be? And to what extent do they impact on the following groups?

Please write your answers below – there is a separate table for the Federated ranks and for the Superintending and ACPO ranks. This is in recognition of the two levels of CRAs (see covering letter). Please feel free to direct your responses to those questions most relevant to you.

FEDERATED RANKS

GROUP	IMPLICATIONS	EXTENT OF IMPACT
<p>Identity Group</p> <p>E.g.</p> <p>Disabled people</p>	<p>Please comment on each group mentioned on the left, considering the following:</p> <ul style="list-style-type: none"> • How do you think the new CRAs affect disabled people wanting to join the police service? • How do you think the new CRAs affect disabled people already in the police service? • How do you think the new CRAs impact disabled people in the community? 	<p>Please select a response from A to E to measure the impact:</p> <p>A. Significant B. Considerable C. Moderate D. Low E. Don't know</p>
<p>Women</p>		

Men		
Disabled people		
Ethnic minority groups		
Faith groups		
Gay, lesbian, bisexual		
Transsexual		

<p>Marital status e.g.</p> <ul style="list-style-type: none"> • Married • Civil partnership • Partnership (other) • Widow/ widower, surviving civil partner/ partner • Divorced, separated • Single • Other 		
<p>Caring and dependent responsibilities</p>		

SUPERINTENDING and ACPO RANKS

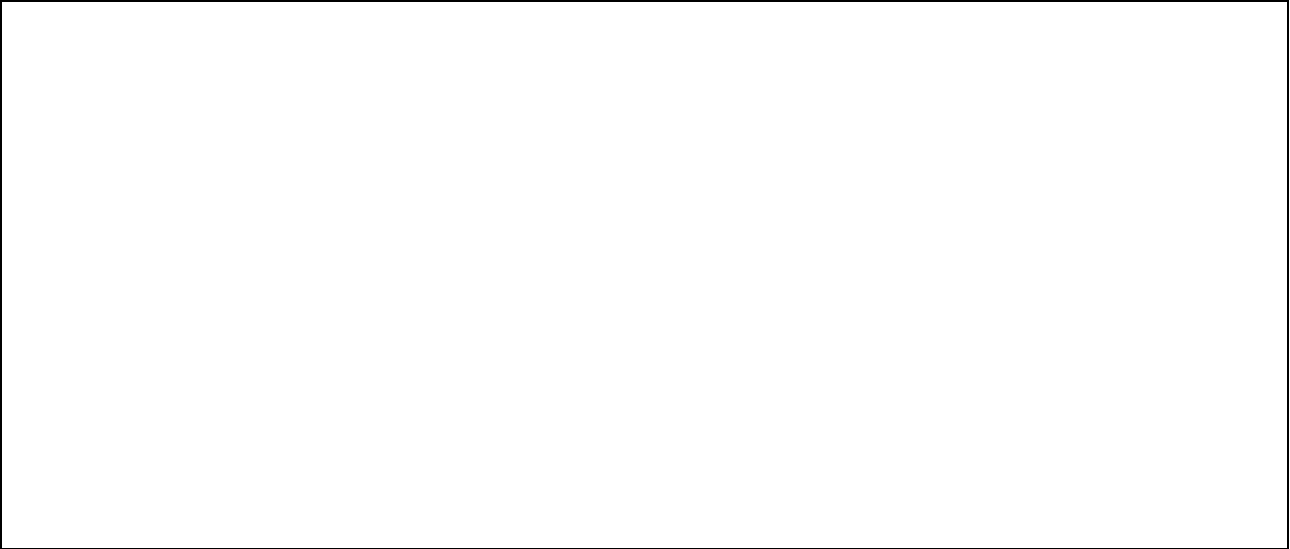
GROUP	IMPLICATIONS	EXTENT OF IMPACT
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<p>Identity Group E.g.</p> <p>Disabled people</p>	<p>Please comment on each group mentioned on the left, considering the following:</p> <ul style="list-style-type: none"> • How do you think the new CRAs affect disabled people wanting to join the police service? • How do you think the new CRAs affect disabled people already in the police service? • How do you think the new CRAs 	<p>Please select a response from A to E to measure the impact:</p> <ul style="list-style-type: none"> A. Significant B. Considerable C. Moderate D. Low E. Don't know
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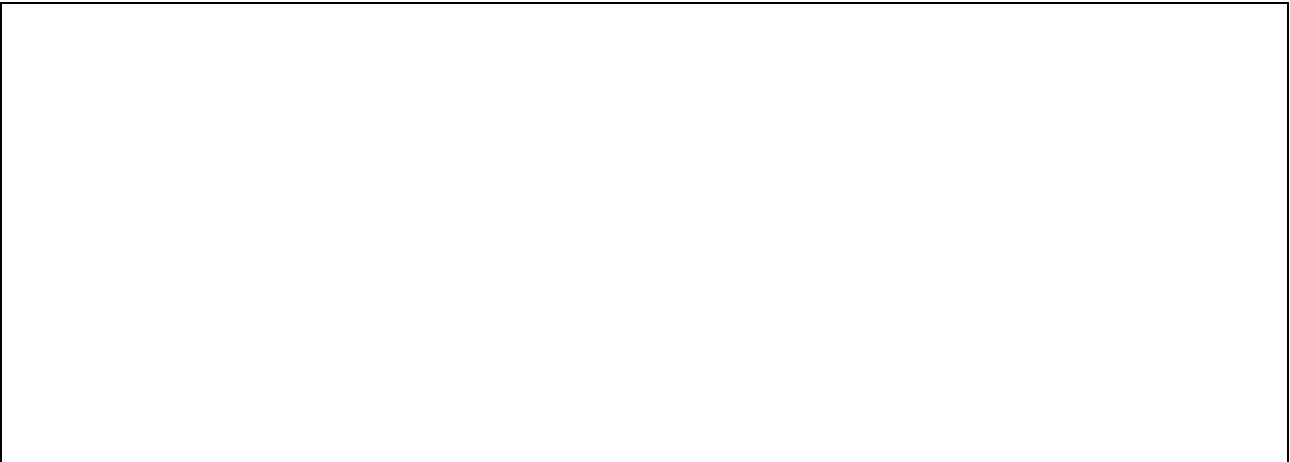
	impact disabled people in the community?	
Women		
Men		
Disabled people		
Ethnic minority groups		
Faith groups		

<p>Gay, lesbian, bisexual</p>		
<p>Transsexual</p>		
<p>Marital status e.g.</p> <ul style="list-style-type: none"> • Married • Civil partnership • Partnership (other) • Widow/ widower, surviving civil partner, partner • Divorced, separated • Single • Other 		
<p>Caring and dependent responsibilities</p>		

2. What do you think the implications would be on **your identity group** if the new CRA's were higher? Please provide examples.



3. What do you think the implications would be on **your identity group** if the new CRA's were lower? Please provide examples.



4. Do you believe that the new CRA's are successfully accommodating the needs, issues and priorities of **your identity group**? Please provide examples. If not, why not?

5. Do you believe that the new CRA's are successfully accommodating **your own** needs, issues and priorities? Please provide examples (if different to above). If not, why not?

6. How do you think the new CRA's could affect relations between **your identity group** and the police service?

7. Do you think the policy could be improved to better achieve its aims for **your identity group**? If so, how?

8. Do you think the policy could be improved to better achieve its aims for **you** (if different to above)? If so, how?

9. Please feel free to make any additional comments using the space below.

A large, empty rectangular box with a thin black border, intended for providing additional comments. It occupies the majority of the page's vertical space below the instruction.