

**Police Federation
of England and Wales**



**Ffederasiwn Heddlu
Lloegr a Chymru**

Established by Act of Parliament

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FROM THE GENERAL SECRETARY'S OFFICE

7 April 2011

Email: specificduties@geo.gsi.gov.uk

Harshbir Sangha
Specific Duties – Policy review
Government Equalities Office
Zone J9, 9th Floor
Eland House
Bressenden Place
London
SW1E 5DU

Dear Harshbir Sangha

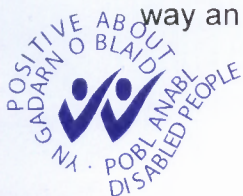
PUBLIC SECTOR EQUALITY DUTY: REDUCING BUREAUCRACY

The Police Federation of England and Wales is the staff association representing the interests of 140,000 police officers, in the ranks of Constable, Sergeant, Inspector and Chief Inspector in Police Services in England and Wales.

We understand that the government is anxious to remove unnecessary bureaucratic burdens from business, and we recognise that the specific duties of the previous public sector equality were predominantly concerned with the production of documentary evidence regarding the promotion of equality. However, we also know that many organisations in the Police Service had failed to fully comply with the requirements of the duty, particularly in respect of equality impact assessments.

Whilst we broadly welcome the government's focus on outcomes rather than processes in the new public sector equality duty, we do not believe that equality outcomes can be achieved without some processes. And it should be incumbent on organisations to report on their activities in this regard.

It is significant that progress on equality was painfully slow for the first 25 years of the life of the Race Relations Act and the Sex Discrimination Act and that equality only became a central feature of the operating principles of all organisations with the introduction of the public sector equality duty. Without a commitment to change the way an organisation functions there cannot be any change to the way people are



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employed or served by their public services. And whilst many will have the commitment, they need to know how that commitment needs to be implemented.

Publication of Engagement Undertaken

There is nothing in the proposed specific duties for example that indicates that engagement with people likely to be affected by an organisation's policies needs to be undertaken. We consider that the requirement to publish information about engagement ensures that engagement has been undertaken by an organisation.

Publication of Equality Analysis

Similarly, the proposal to remove any requirement to publish an equality impact assessment/equality analysis of an organisation's policy development will be, in our view, a retrograde step. It should be a requirement of every public body that they show how they have considered equality when designing policies and arrangements. The removal of this requirement gives a green light to organisations to discount or ignore matters of equality. This is a particular concern to us as we know that Police Service organisations have consistently failed to get to grips with the current equality impact assessment requirements.

For equality to be properly embedded in an organisation's thinking there needs to be a sensible assessment of what they are trying to do against the potential discriminatory impact on individuals from different groups. This should be an opportunity for organisations to properly understand how their commitment to improving equality is shaping up rather than implying that it is a burden on business.

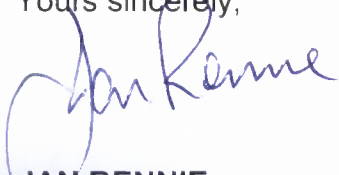
Timing

We are particularly disappointed that the government's revised proposals come at a very late stage, even before the last iteration of the duties had been implemented. This, coupled with the enormous difference in the proposed specific duties in England, Wales and Scotland, creates the impression that this government is not committed to the advancement of equality in its jurisdiction.

For equality to become a reality in the public sector and in society generally there needs to be consistent and firm leadership from government. This vacillation concerning the duties coupled with an apparent lack of commitment to the required detail of implementation does not send the required message that the public sector must work to ensure equality and diversity is mainstreamed in all they do.

We urge the government to implement the draft specific duties regulations as published on 12 January 2011 as originally proposed and to assess their implementation together with those in Wales and Scotland before making any changes.

Yours sincerely,



IAN RENNIE
General Secretary