



Diversity Unit

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Dear Sir / Madam

Re: Specific Duties Policy Review

I would like to formally state that feedback was provided to staff from the Government Equalities Office last September. This was undertaken during a regular network meeting of lead Equality and Diversity Managers in the forces. At the northern regional meeting feedback was provided through the National Policing Improvement Agency and as I understand, it was presented to the Government Office.

There was very strong feedback provided by the forces in relation to a lack of clarity and the amount of bureaucracy which appeared to have increased rather than decreased with the new duties. It is therefore somewhat strange to discover that at this stage in time, the concerns over bureaucracy are at the heart of this review and consultation.

In general terms, concerns have been expressed in relation to the proposed changes. There is general agreement for the need to ensure bureaucracy is kept to a minimum thereby ensuring greater time and effort can be spent achieving effective outcomes for employees and members of the public. However, what is being proposed could be interpreted as a backward or an undoing of the progress that many public bodies have made since the introduction of the equality duties. Examples may be found in the proposal to publish information rather than "sufficient" information, the removal of the requirement to publish details of the analysis in relation to policies and practices and similarly the removal of the requirement to publish details of the engagement that has taken place with the public.

The obvious fear for communities and equality specialists is that the use of discretion and removal of requirements such as equality impact assessments will create an escape route for some to at best limit their effort and at worst avoid their legal obligations.

Yours faithfully

Norma Brown
Director of Diversity