



## Equality Analysis

Guidance to support completion of EAs can be found on [the Equality Analysis Sharepoint](#).  
Guidance on the Public Sector Equality Duty in Defence [can be found in JSP 887](#).

| CONTACT DETAILS                         |   |
|---|---|
| 1. Name of proposal owner               | Nicky Talbot  |
| 2. Department, Faculty, Unit or Section | Service Complaints & Behaviours Team  |
| 3. Contact name and email               | Talbot, Nicky B1 (People-CEJ-SCB-DHd)<br><a href="mailto:Nicky.Talbot101@mod.gov.uk">Nicky.Talbot101@mod.gov.uk</a> |

| STAGE ONE: PROPOSAL DETAILS  |  |
|--|--|
| 1. Name of policy, function or practice (proposal) being assessed  | JSP 831 - Redress of individual grievances: Service Complaints   |
| 2. Reason for EIA (check as appropriate)<br><br>Please check the appropriate box   | <input type="checkbox"/> New policy, function or practice<br><input type="checkbox"/> Change to an existing policy, function or practice<br><input checked="" type="checkbox"/> Review of existing policy, function or practice<br><input type="checkbox"/> Other (please state) |
| 3. Date when the proposal is anticipated to come into effect   | 1 September 2025   |
| 4. Purpose of the proposal or review   |  |
| <p>JSP 831 is the authoritative policy and guidance for all MOD Service Personnel and civilian employees when making, responding to, advising on, investigating and deciding Service Complaints. It is intended as a guide for all MOD Service Personnel and civilian employees on the application of policy for Service Complaints. The purpose of this Review of the JSP is to ensure that it consistent and up to date and makes the following minor amendments:</p> <ul style="list-style-type: none"><li>- Removal of references to the making of Service Complaints regarding Service Police from the body of the policy document and adding those types of complaint to the Excluded Matters.</li><li>- The approach to applying just and equitable consideration when making admissibility decisions.</li><li>- Updated guidance relating to the making of Malicious and Vexatious complaints.</li><li>- New guidance on the local resolution process.</li></ul> |  |
| 5. Who does the proposal impact?   |  |
| <p>All MOD Service personnel and civilian employees – this JSP provides guidance on the processes involved in Service Complaints and best practice to apply. It intends to provide service personnel with a fair, efficient, and effective process to address and seek redress for valid grievances related to their service in the Armed Forces.</p>  |  |
| 6. Legislative or other legal requirements?  |  |

Consideration of the Public Sector Equality Duty (PSED) as set out in Section 149 of the Equality Act 2010 is afforded to this review.

## 7. Who will deliver, communicate and implement the policy or proposal?

The review of the policy will be implemented by the Service Complaints & Behaviours (SCB) Team and any changes to policy or wording will be released by way of an updated JSP 831. The communications will be managed by the SCB team targeting the entire organisation.

## STAGE TWO: EVIDENCE BASE AND CONSULTATION

### 4. Information sources

What data has been used to evaluate impact on people sharing protected characteristics?

It is considered there will be no impact to protected characteristics or further characteristics described in the Protected Characteristics Guide (People CivHR Diversity and Inclusion - Equality Analysis - [Equality Analysis Protected Characteristics Guide\\_OS.pdf - All Documents \(sharepoint.com\)](#)). JSP 831 provides guidance (policy and procedure) on seeking redress for valid grievances related to Service Complaints and does not identify or discriminate against protected characteristics.

### 5. Gaps in evidence

Please identify any gaps in evidence which prevented a proper assessment of the proposal.

No gaps in evidence identified.

## 6. Engagement

|                            |                            |  |
|----------------------------|----------------------------|--|
| <b>Consultation(s)</b>     | <b>Date(s)</b>             | 25 Feb 25 & 24 Jun 25  |
|                            | <b>Audience</b>            | Service Complaints Working Group   |
| <b>Consultation(s)</b>     | <b>Date(s)</b>             | 28 Feb 25 & 19 Jun 25  |
|                            | <b>Audience</b>            | Single Service Representatives (Service Complaints Teams)                |
|                            | <b>Main issues raised</b>  | Emails to the Services sharing proposed changes and requesting comments. |
| <b>Consultation (s)</b>    | <b>Date (s)</b>            | 28 Nov 24 & 28 Feb 25  |
|                            | <b>Audience</b>            | Service Complaints Ombudsman for the Armed Forces (SCOAF)                |
|                            | <b>Mains issues raised</b> | Emails to the SCOAF sharing proposed changes and requesting comments.    |
| <b>Consultation (s)</b>    | <b>Date (s)</b>            | 1 Aug 25   |
|                            | <b>Audience</b>            | Trade Unions (People Employee Relations Team)                            |
|                            | <b>Main issues raised</b>  |  |
| <b>Other engagement(s)</b> | <b>Date(s)</b>             | Frequent engagement since 21 Nov 24                                      |
|                            | <b>Audience</b>            | MODLA Team – Chloe Willingham  |
|                            | <b>Main issues raised</b>  | Legal advice   |

## STAGE THREE: ASSESSING IMPACT AND ACTION PLANNING

### 7. What are the potential or actual impacts of the policy or proposal when assessed against each of the following protected characteristics?

| Reviewed characteristic <sup>1</sup> |                          |                                     |                          | <p><b>Detail of impact</b></p> <p><i>Explain whether, and if so, how, the proposal will affect people differently according to their expression of this characteristic.</i></p> <p><i>Will the policy need to be adapted to support the differential needs of the Protected Characteristics? This section should be completed whether the impact is positive or negative. With positive impact, detail the actions you will take to promote the positive impact to the organisation in the next column.</i></p> | <p><b>How will you mitigate or remove any negative impacts, promote any positive impacts, or adapt your policy to peoples' needs?</b></p> <p><i>You must have due regard to the need to:</i></p> <p><i>(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;</i></p> <p><i>(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;</i></p> <p><i>(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</i></p> <p><i>If a negative impact is identified, explain the business need or direction given and why the proposed measures are appropriate and proportionate to achieve that. Where you identify a negative impact which cannot be objectively justified identify what changes you will make to your proposal to address this.</i></p> | <p><b>Owner of action</b></p> <p><i>Identify who is responsible for mitigation or elimination if negative impacts have been identified or promote positive impacts identified.</i></p> | <p><b>Timescale</b></p> <p><i>Provide brief timescale for completion of mitigation or elimination if negative impacts have been identified or promote positive impacts identified.</i></p> |
|--------------------------------------|--------------------------|-------------------------------------|--------------------------|---|---|--|--|
|                                      | Positive impact          | No impact                           | Negative impact          |   |   |  |  |
| Age                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |   |  |  |
| Disability                           | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |   |  |  |

<sup>1</sup> The provisions of the Equality Act 2010 relating to work, contain exceptions so far as relating to age, sex or disability in service in the Armed Forces. Please see the [Equality Duty Toolkit](#) for further information.

|   |                                     |                                     |                          |   |  |  |  |
|---|-------------------------------------|-------------------------------------|--------------------------|---|--|--|--|
| Gender reassignment                         | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |  |  |  |
| Marriage and civil partnership <sup>2</sup> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |  |  |  |
| Pregnancy and maternity                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |  |  |  |
| Race  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | The amendments to the Local Grievance Resolution (LGR) aspect of this Policy will, on their face, apply to everyone subject to the policy, although ethnic minorities who have been overrepresented in the system could therefore be more disproportionately affected. As reported by SCOAF in her Annual Reports 2021 to 2024, ethnic minority Service Personnel raised more complaints proportionately than any other group – this increased trend is also reflected in the MOD Civil Service grievance procedure. In general terms this is likely to include persons with the protected characteristic of race.  | Working with Defence Digital Channels (DDC), we will ensure that the update of JSP 831 is highlighted and published via Defence intranet, and also instruct the single Services (sS) Complaints Secretariat to update their intranet sites with the latest edition.<br><br>Furthermore, there is an already existing entitlement to an Assisting Officer (AO); a person identified to help the Complainant, or the Respondent navigate the complaints process. |  |  |
| Religion or belief                          | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time.   |  |  |  |
| Sex   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | The amendments to the Local Grievance Resolution (LGR) aspect of this Policy will, on their face, apply to everyone subject to the policy, although women are overrepresented in the system therefore are more disproportionately affected. As reported by SCOAF in her Annual Reports 2021 to 2023, female Service Personnel raised more complaints proportionately than any other group, but the 2024 Annual Report shows an increase in complaints raised by female Service Personnel. This increased trend is also reflected in the MOD Civil Service grievance procedure. In general terms this is likely to include persons with the protected characteristic of sex. | Working with Defence Digital Channels (DDC), we will ensure that the update of JSP 831 is highlighted and published via Defence intranet, and also instruct the single Services (sS) Complaints Secretariat to update their intranet sites with the latest edition.<br><br>Furthermore, there is an already existing entitlement to an Assisting Officer (AO); a person identified to help the Complainant, or the Respondent navigate the complaints process. |  |  |

<sup>2</sup> Marriage and Civil Partnership is a protected characteristic under the Equality Act 2010 but is not a “relevant protected characteristic” for the purposes of PSED and does not need to be considered for full compliance with the duty.

|                                |                          |                                     |                          |   |  |  |  |
|--------------------------------|--------------------------|-------------------------------------|--------------------------|---|--|--|--|
| Sexual orientation             | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time. |  |  |  |
| Applies to all characteristics | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time. |  |  |  |
| Other <sup>3</sup>             | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No equality impact(s) has been identified at this time. |  |  |  |

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<sup>3</sup> Any further characteristics outside of those specified in the Equality Act that may be relevant, eg. Part time workers, carers.

## STAGE FOUR: OUTCOME

### 8. Please select one of the outcomes below for how the proposal will be progressed

☒ **No impact identified at this time.**

*As a result of assessing the policy against the protected characteristics, no equality impact(s) have been identified.*

☐ **Continue the proposal without adjustments for adverse impact.**

*One or more adverse equality impacts have been identified. However, the proposal meets critical business need AND is an appropriate and proportionate means to achieve that aim.*

☐ **Continue the proposal making adjustments where required.**

*One or more equality impacts have been identified. Mitigating actions to address this will be taken. (as detailed in Table 14)*

☐ **Stop the proposal because adverse impacts cannot be prevented or objectively justified.**

*One or more adverse impacts have been identified which cannot be objectively justified and it is not possible to make adjustments to address the adverse impact; it may be necessary to stop the proposal.*

## PROPOSAL COMPLETION

### Signed by Proposal Owner (1\* or above)

*The proposal owner is responsible for ensuring that all actions and review dates are met and the Equality Analysis is updated accordingly.*

*The proposal owner is responsible for ensuring that the EA has been quality assured.*

Signature: Nicky Talbot

Date: 01 September 2025

### Signed by MODLA

*Necessary only for major new policy and legislative proposals.*

Signature:

Date:

## Next Steps

Once the EA is signed, ensure the EA and the evidence informing the assessment is saved according to the guidance [available here](#).