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**PSNI**  
**SECTION 75**  
**EQUALITY IMPACT ASSESSMENT**  
**PROMOTION OF POLICE OFFICERS**  
**EXECUTIVE SUMMARY**

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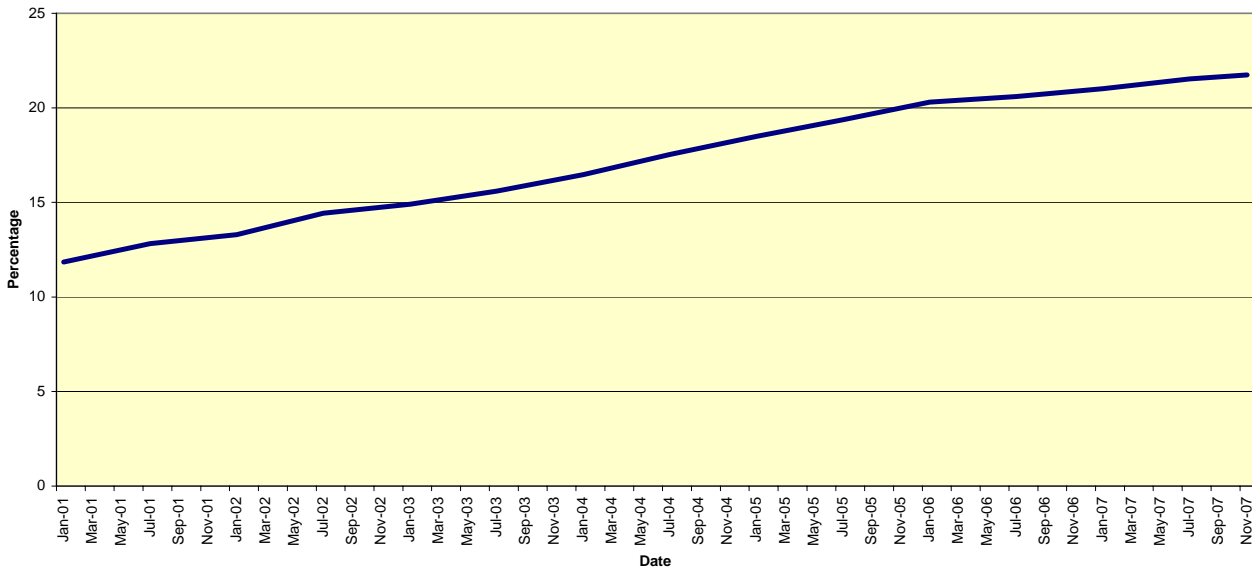
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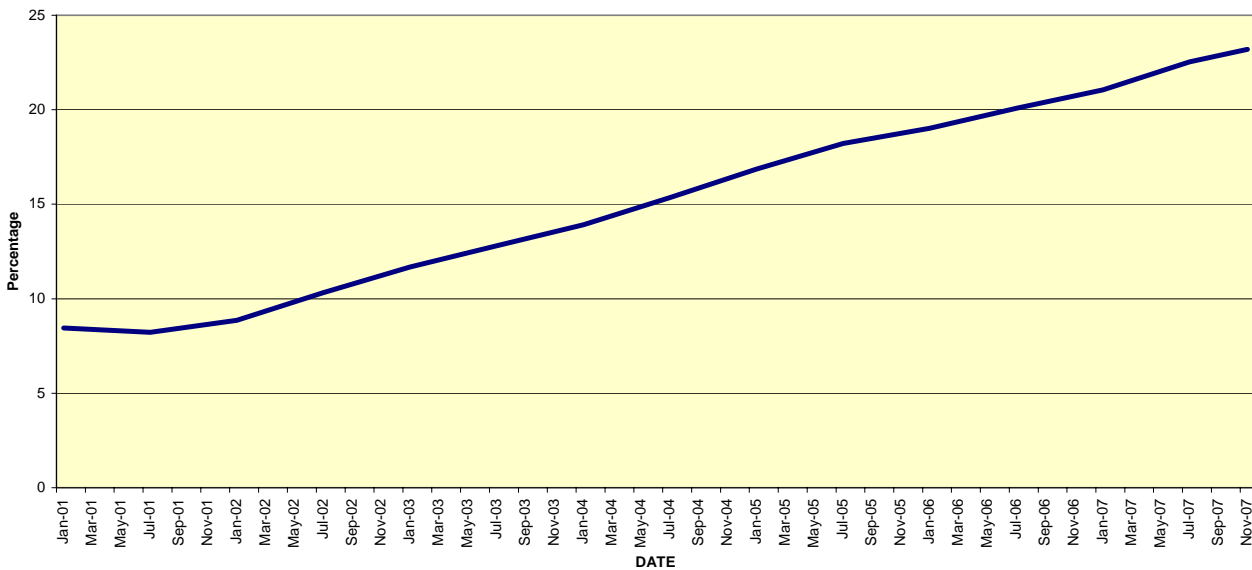
# 1 INTRODUCTION

To put this EQIA into context the unprecedented change which the PSNI organisation has undergone should be noted. In terms of the general workforce establishment a concerted effort has been made to address under representation, equality and diversity. The present workforce composition reflects an increase in females (see graph), people from a Catholic (see graph) and ethnic minority community backgrounds and employment related legislation, e.g. the Disability Discrimination Act has been applied to the organisation.

Percentage Female Strength January 2001 to Date



Percentage Catholic Strength January 2001 to Date



This Equality Impact Assessment (EQIA) relates to the Promotion of Police Officers as administered by the Police Service for Northern Ireland (PSNI). It follows an EQIA Consultation Paper presented for public consultation in April 2007.

It is based on data from a number of sources, which include reviews, and analysis of previous promotion processes.

A small number of written responses to the consultation process were received. In addition, a number of responses were collated through meetings and focus groups organised a part of the consultation process. In coming to the final decisions as presented in this report, PSNI considered the responses from the consultation and set those along side existing data.

## 1.1 Results

The results of the initial EQIA indicated the following: -

<b>Category</b>	<b>Findings</b>
<b>Men and Women Generally</b>	<p>Analysis of the quantitative data relating to promotion indicated that in the promotion processes of Constable to Sergeant and Sergeant to Inspector no negative impact or potentially negative impacts were highlighted. Variances were noted in terms of gender, which appear related to choice by female officers to wait longer than male colleagues when sitting Stage 3 of the promotion process. While less female officers are likely to apply for promotion at this stage there is nothing to indicate there is a differential impact as a direct result of the promotion procedure.</p> <p>In relation to applications for higher rank there are indicators that less female officers put themselves forward for promotion in comparison to their colleagues. The number of females who are likely to be successful in such a competition is low. This is due, in part, to the fact that the backlog of officers eligible to seek promotion to the rank of chief inspector is predominately male. However, setting aside any limiting eligibility consideration, the numbers are large enough to cause further concern.</p>
<b>Persons with Disability and Persons without Disability</b>	<p>There is a negative differential impact on officers who have a specific record of sick leave. This is a direct differential impact by reason of established criteria for promotion.</p>
<b>Persons of Different Religion</b>	<p>A differential exists between the number of catholic officers promoted and their protestant colleagues. The differential appears to be due to the legacy of the historical imbalance. A 50/50 policy of recruitment is geared towards addressing that</p>

	imbalance which should have a knock on effect on promotion.
<b>Persons of Different Race</b>	This is similar to religion were there is negative differential existing as a result of historical factors and the present low numbers of officers from the ethnic minorities.
<b>Persons of different Marital Status</b>	There is nothing to indicate that there is a negative or positive differential in relation to marital status.
<b>Persons of different Political Opinion</b>	No data is recorded by PSNI in relation to political viewpoint so there is nothing to indicate positive or negative differential impact. The association with religion may allow for speculation but such would be inaccurate and invalid.
<b>Persons of different Sexual Orientation</b>	No data is available in terms of sexual orientation and promotion. There is nothing to indicate that a differential exists either positive or negative in the promotion policy and processes.
<b>Age</b>	Officers have to complete a set period of experience within the rank to be able to move forward to the next level. In some ranks these are probation periods. This has the potential to have a differential impact on some officers due to them have to wait until they have the prerequisite period before being allowed to go forward for promotion.

## 1.2 Decisions

In consideration of the results above and the findings from the consultation PSNI will take the following actions:

### Monitoring

Action – From June 2007 all members of staff (police and police staff) will have been requested to provide data/information in respect of all nine Section 75 categories. This will form part of their personal record and steps are being taken to allow all employees to access and update their personal record including information in respect of equality. This will also allow all nine Section 75 categories to be monitored and potential impacts identified.

### Action

In accordance with the Police Annual Performance Review Policy the effectiveness of the process will be monitored.

## Men and Women in General

Action – PSNI will monitor the Gender Action Plan and the Shared Future Strategy to ensure their progress is maintained and the recommendations in regards to a mentoring scheme for female officers and targeted training and development programmes are implemented.

Action – Where there is a clearly identified under representation of female officers, Human Resource will conduct personal career development interviews with female officers eligible for promotion to senior ranks. These interviews will be directed towards assisting officers identify skills and competencies needed to prepare them for meeting criteria for promotion should they wish it.

Action – PSNI will invite female supervisory officers to access the Positive Action Leadership Development Programme.

Action – PSNI will monitor the rate of applications for senior ranks by female officers and analyse the influence of support measures on those rates.

Action – Subject to continuous funding and selection of a suitable candidate, a Network Support Officer will be appointed to support and raise the profile of female officers.

## Religious Belief

Action – PSNI will continue to monitor and review the number of Catholic officers seeking and gaining promotion.

Action – PSNI will invite officers from Catholic backgrounds to access the Positive Action Leadership Development Programme.

## Racial Background

Action – PSNI will continue to monitor and review the number of ethnic minority officers seeking and gaining promotion.

Action – PSNI will examine potential strategies to encourage and support ethnic minority officers in seeking and gaining promotion.

Action – PSNI will appoint a full-time Network Support Officer to support the ethnic minority police association (this will be subject to continuous funding). This will raise and establish the profile of ethnic minority officers from an organisational perspective.

## Sexual Orientation

Action – Subject to continuous funding and selection of a suitable candidate, a Network Support Officer will be appointed to support the development of the gay police association within the PSNI. This will raise and establish the profile of gay officers from an organisational perspective.

## Disability

Action – PSNI will continue to monitor and analyse applications for promotion from officers who have declared a disability and ensure the requirements of the DDA are fairly applied.

## Work Based Assessment

Action – PSNI will monitor the application of and assess the effectiveness and equality of the work based assessment process.

## Career Development and Training

Action – A First Line Managers Course will be implemented in early 2008 during which individual training needs will be identified and an ongoing programme of development through the Core Leadership Development Programme will be established for each officer promoted. This will be followed by the establishment of an Inspector's programme in October 2008, which will complement the process of development established through the Sergeant's programme.

Action – Both programmes will be monitored and assessed to ensure compatibility with and benefit for the officers concerned.

## **2. BACKGROUND TO THE PSNI RECRUITMENT PROCESS**

The promotion process is designed by Occupational Psychologists applying best practice principles with applicants having to meet set criteria for entry into the promotion process. The process aims to promote the most suitable supervisors and managers which will enhance the leadership capacity of the organisation and ensure a better service delivery to the public thus achieving targets set by both the Policing Plan and local District Policing Partnerships (DPP).

The function seeks to ensure that all members receive fair and equal career development to provide the best possible service to PSNI, the individual and the community. It aims to implement promotion procedures that are credible, transparent and equitable and have the confidence of the staff. It seeks to select the best leaders for the organisation, reduce the number of challenges of the process and highlight development needs for officers.

The PSNI Promotion process is directed towards the selection of the best person to fit the role, duties and ranks required to fulfil the organisations commitments and duties.

### **3. DATA COLLECTION AND CONSULTATION**

#### **3.1 Data Collection**

Data was collated utilising the following sources:

- **Statistical Information relating to promotion process.**
- **Analysis of Superintendent Assessment Centre November 2001 Promotion Process (2002)**
- **Women and Promotion, Interim Report 2005**
- **Her Majesty's Inspector of Constabulary (HMIC) Review – December 2005.**

#### **3.2 Consultation**

A consultation process was employed which attempted to reach and engage not only those the policy impacts on but those who had an interest in and direct involvement with Section 75 categories.

The following actions were taken: A consultation process was employed which attempted to reach and engage not only those the policy impacts on but those who had an interest in and direct involvement with Section 75 categories. A twelve-week period of consultation was set-aside for this EQIA, which ran from the 16<sup>th</sup> March 2007 to 8th June 2007.

The following actions were taken:

- Letters were distributed to Key stakeholders and individuals them of the consultation and availability of relevant consultations documents.
- A notice was sent to each member of the organisation informing them of the EQIA and accessibility.
- Public notices were placed in the *Belfast Telegraph*, *Irish News* and *News Letter* newspapers, inviting comment in accordance with good practice.
- Direct accessibility to IT formats via the Home Page was offered on the PSNI's website.
- Offers for individual consultation meetings were made available.
- PSNI offered the availability of suitable copies of documents in diverse formats and in a timely manner. No requests were made.
- Fourteen meetings/interviews and a focus group of nine female trainees were arranged. Twelve of the meetings/interviews involved 15 individual female members and one male member of police staff and the following stakeholders were also represented at meetings/interviews:



Ethnic Minority Police Association  
Gay Police Officers Association  
British Association of Women Police Officers  
Equality Commission for Northern Ireland

## 4 KEY FINDINGS

The Equality Commission made specific comment in respect to the methodology applied to the EQIA, i.e. more analysis and information should have been provided in respect to gender, religious background and disability and these have been addressed where possible in the final EQIA document. In addition to a general agreement that promotion is a life style choice and officers promoted should be capable and able of carrying out the role required the key findings of the consultation process were as follows: -

- **Potential Impacts:**

Under-representation –

- There is under-representation of  
Female officers in senior ranks (Superintending and above)  
Catholics in senior ranks.  
Ethnic Minority officers in all ranks

Profile –

- The organisation should raise the profile of ethnic minority categories.

Affirmative targeting –

- External respondent feels there is a need for affirmative targeting and support to address under-representation of Female, Catholic and Ethnic Minority Officers.

- **Promotion Process**

Competencies –

- Bound to specific posts and it is difficult to evidence them for some officers due to position and role.
- There is a lack of formal or informal opportunities to gain evidence of competencies.
- Some respondents feel the length of service criterion should be abandoned while others feel it should be maintained.

Ethnic Representation –

- More ethnic representation should be considered for promotion processes.

Consistency –

- There should be consistency in the promotion process.

Appraisal System –

- The use of an appraisal system or work based assessment are perceived as being prone to subjectivity and abuse by appraisers, intentionally or otherwise.
- The under-representation of female senior officers means there is a potential for appraisers, being male, to fail to understand female expectations or needs.
- Any appraisal system used needs to be seen and considered as robust and fair.

Attendance Records –

- External respondent feels there is a need to examine the use of attendance records in assessing suitability for promotion.

- **Career Development/Support**

Policy/Process –

- There is no career development or management of expectations available for officers considering promotion.

Support –

- Support services and policies for members with families or dependents are as yet unavailable.
- There is a perception among some respondents that there is a lack of support and training for newly promoted officers.

**The submissions made by respondents both written and findings from meetings/interviews are attached at Appendix VIII of the full [EQIA](#). PSNI responses are also included.**

## **5. CONCLUSION**

This EQIA has been applied utilizing the data and information available from the sources identified. While the EQIA initially highlighted findings, which could be equated with potential impacts there are a number of actions that are already being applied to this process that address those potential impacts. Taking those actions and the findings from the public consultation into consideration PSNI comment as follows: -

### **5.1 Monitoring**

The need for monitoring of **all** Section 75 categories to ensure adequate valid and reliable data/information is available to screen and carry out EQIAs of policies etc. is recognised by PSNI. From June 2007 all applicants and appointees, both police and police staff, have been requested to provide data/information in respect of all nine Section 75 categories. This will form part of their personal record and steps are being taken to allow all employees to access and update their personal record including

information in respect of equality. This will also allow all nine Section 75 categories to be monitored and potential impacts identified.

## **5.2 Length of Service Criterion**

Probation periods have been introduced for the ranks of Sergeant and Inspector. PSNI does not feel that the removal of length of service as a criterion for senior rank positions can be removed as yet. The continuance of the severance scheme in compliance with the Patton Commission has an impact on the knowledge and experience base of the organisation. To ensure those appointed into senior positions are adequately equipped for the role the organisation will continue to apply this criterion to the promotion processes where and when required. Skill gaps have arisen which has required the organisation to seek transfers for specific ranks, e.g. Sergeants from other forces. As with all promotions advertising takes place across all UK police services and An Garda Síochána.

## **5.3 Appraisal**

PSNI introduced a revised performance appraisal process for police officers in April 2007. This process is directed towards the fair and consistent evaluation of performance. The appraisal will form a key component of the promotions process for police officers. The process will be assessed and evaluated to ensure that it is robust and objective in its application.

## **5.4 Men and Women Generally**

PSNI recognises the under-representation in regards to female officers in senior ranks and the low level of take up of opportunity in regards to them seeking such positions. The consultation has highlighted various factors, which impinge on the decision by female officers in seeking promotion to higher ranks. To assist in increasing the numbers of female officers considering promotion to senior ranks individual interviews have been held with female officers who may be eligible for promotion to those ranks. This has resulted in all of those female officers who meet the criteria for the next promotion process to the senior rank of Superintendent applying.

A Positive Action Leadership Development Programme is available which is directed towards personal leadership development with an emphasis on individuals recognising their own skills and assisting them to develop their careers in whatever direction they chose to take. To assist in the consideration of career development to more senior positions access to this programme will be made available to female officers in supervisory ranks.

In addition to the above actions policies and schemes which are targeted towards reducing the influence of factors which may influence a female officer's decision to seek promotion are in the process of being introduced and applied to the organisation, i.e. Gender Action Plan, Child Care Voucher Scheme, Flexible Working, Work Life Balance and Shared Future Strategy.

In 2003 PSNI introduced a Gender Action Plan, which is directed towards:

- To investigate and address existing and future policies, procedures and practices which inhibit or exclude females from playing a full role within the Police Service of Northern Ireland.
- To examine the working practices of the organisation and propose actions which will enhance the work/life balance while ensuring operational effectiveness.

Since its inception the plan has been progressed with the establishment of a Women's Police Association, the PSNI joining the British Association of Women Police (BAWP). Mentoring for female officers was specifically identified within the plan and this is being progressed. Some informal mentoring has taken place as a result of the initial meetings among female officers within the Association.

The Child Care Voucher Scheme has been introduced with a Child Care Coordinator appointed to manage the process. This will assist officers in accessing Child Care thereby reducing one of the impacts on female officer's consideration of career development.

In addition to this the Shared Future Strategy targets women's needs and sets targets towards which the organisation is committed to achieving.

### **5.5 Religious Belief**

While there may be some variance in the ratio of Catholic to Non-catholic officers as the severance programme continues PSNI anticipates an increase in the ratio of Catholic officers being promoted through the ranks. Analysis of those officers promoted from November 2001 indicates the following:

	Catholic Background	Non-Catholic Background
Sergeants Promoted	51.52%	48.46%
Inspectors Promoted	25%	75%

There were only four Inspectors promoted and the pool of eligible catholic Sergeants would not have been as big as those from Non-Catholic background. The overall trend reflects a movement towards equal success rates in regards to promotion in terms of religious background. PSNI is committed to continuing this trend and will seek to encourage officers from a Catholic background to consider promotion as part of their career development.

In pursuit of that aim officers from a Catholic background will be invited to attend the Positive Action Leadership Development Programme as described in the men and women in general reference above.

### **5.6 Racial Background**

There is a need for ethnic minority officers to feel they can seek and gain promotion within the PSNI. Due to the historical fact that ethnic minorities were few in both

Northern Ireland society and the police numbers are low in comparison to officers from Catholic and Protestant backgrounds. There are some ethnic minority officers in middle management positions.

Ethnic minority officers have attended the Positive Action Leadership Development Programme, as described above. Officers attending this programme provided a positive feedback as to its effectiveness in assisting them with personal/career development.

In addition to this a number of strategies, programmes, seminars and campaigns in liaison with representatives of ethnic minority groups have been organised to address issues around hate crime and police response. These help raise the profile relative to how PSNI is perceived in addressing the needs and concerns of the ethnic minority community. The introduction of an Independent Advisory Group with whom the organisation can consult also reflects a commitment to responding to the needs and concerns of ethnic minorities.

A full-time Network Support Officer has been appointed to support the ethnic minority police association. This will raise and establish the profile of ethnic minority officers from an organisational perspective.

### **5.7 Disability**

The requirements of the Disability Discrimination Act are applied to all policies etc. within the PSNI. The consideration of an application by an officer in regards to promotion, who may have declared they have a disability, is done so on an individual basis. A number of officers have been accommodated during the promotion process. Assistance has been provided to officers with writing difficulties, by the provision of scribes to assist in the written aspect of the process.

### **5.8 Persons of different sexual orientation**

While the EQIA did not identify anything, which was felt to impact adversely on members of the Lesbian, Gay, Bisexual and Transsexual community the consultation did highlight some issues for this community. There was a feeling that some affirmative action should take place to ensure the organisation was reflective of society. It is felt that equality would be helped by members being able to feel secure enough to identify with their sexuality. Positive action leadership in relation to recognition of sexual orientation needs and issues and more positive action in regards to hate crime and the treatment of victims from the LGBT community would help improve the organisational climate in respect of sexual orientation.

Similar to people of different racial backgrounds a number of strategies, programmes, seminars and campaigns in liaison with representatives of the LGBT community have been organised to address issues around hate crime and police response. The success of many has been highlighted by the LGBT community, e.g. Foyle District Command Unit's recognition and response to hate crime in Londonderry/Derry.

Independent Advisory Groups (IAGs) have also been established which are consulted on issues relevant to the groups they represent.

A Network Support Officer will be appointed to support the development of the gay police association within the PSNI. This will raise and establish the profile of gay officers from an organisational perspective.

### **5.9 Work Based Assessment**

The introduction of a work based assessment in lieu of Stage Three of the promotion process for sergeants/Inspectors is directed towards measurement of competencies. Some concern has been raised in regards to the subjectivity of this process. The process will be subject to quality assurance measurement and the right of appeal will be provided. It is anticipated that these measures will counter subjectivity and provide objective measurement.

### **5.10 Career Development and Training**

Consistency was highlighted as an issue, particularly among female officer respondents.

Consistency of process has an impact on all officers considering their career development and planning for achievement of evidence of competencies irrespective of background. PSNI is committed to achieving consistency but due to the dynamic aspect the organization finds itself in as a result of reorganization PSNI reserves the right to adjust promotion processes to meet the organizational needs and operational requirements.

Reference has been made to influencing factors which impact on decision by officers, of whatever background, in respect of promotion e.g.

- Mentoring
- Family commitments

PSNI recognises these and reference has been made to some of the support policies/schemes, which might assist female officers. These would also impact on officers with dependents irrespective of gender.